Forensic Environmental Services, Inc.
113 John Robert Thomas Drive
The Commons at Lincoln Center
Exton, Pennsylvania 19341

Telephone: (610) 594-3940 Telecopier: (610) 594-3943

June 25, 2003

Mr. Eric Blischke
Oregon Department of Environmental Quality
Northwest Region Portland Office
2020 Southwest 4th Avenue, Suite 400
Portland, Oregon 97201-4987

ORIGINAL

Re: GS Roofing, ECSI #117

Dear Mr. Blischke:

Pursuant to your September 30, 2002 correspondence and the appended September 10, 2002 "DEQ Site Assessment Program – Strategy Recommendation", GS Roofing has elected to pursue the Voluntary Cleanup Program's Independent Cleanup Pathway (ICP) to complete an expanded preliminary assessment of the facility located at 6850 NW Front Avenue. This approach is consistent with DEQ's determination that the GS Roofing property is a "medium" priority site. To this end, attached you will find the executed ICP Intent to Participate form (Attachment 11). Although GS Roofing has chosen to pursue the alternative that limits requisite DEQ interaction, GS Roofing is interested in soliciting DEQ's review at critical junctures, as appropriate, in order to effectively and efficiently complete the Expanded Preliminary Assessment (XPA) and evaluate the impact, if any, this facility might have had on the Lower Willamette River.

Based upon our review of the September 10, 2002 "DEQ Site Assessment Program – Strategy Recommendation" several points require clarification as follows:

- Page 2, second to last paragraph: benzoic acid was not detected (<200 ppb) in sediment sample SD97 and therefore did not exceed two times the purported Portland Harbor baseline concentrations as noted.
- Page 3, paragraph 5: CertainTeed Corporation acquired GS Roofing in 1999 and is the current property owner;
- Page 3, last paragraph and page 4, paragraph 2: GS Roofing does not currently produce tarpaper at the facility, this product line was reportedly discontinued sometime in the mid-1980's;
- Page 3, third paragraph: the references to "asphalt stills" is ambiguous, the production of asphalt through the distillation of petroleum oil has not been reported at this site, rather "blowing asphalt" (a process whereby the light volatile ends are removed from raw asphalt) was historically conducted at this facility, but this process was discontinued prior to 1970;

- Page 4, paragraph 1; page 6, last paragraph; and page 7, first paragraph: the facility does not currently employ an electrostatic precipitator, this device was replaced with a CECO Filter System in August 1996;

- Page 4, paragraph 2; page 6 (Hazardous Waste Division Files); page 7, third paragraph; and page 12, first and second bulleted conclusion: the facility doesn't currently employ or store zinc granules, the use of zinc granules was reportedly discontinued in 2000;

- Page 4, paragraph 5: pursuant to a March 15, 2001 DEQ's no further action letter (Attachment 1) regarding LUST file No. 26-90-0119, all but one monitoring well (MW- 1, located on the upgradient property boundary) in the array previously installed to investigate and decommission two former USTs have been properly abandoned;

- Page 7, third paragraph; page 10, last paragraph; and page 12, first and second bulleted conclusion: copper granules were reportedly not employed in the manufacturing process until October 1998, this postdates the period when the eastern portion of the site was filled (i.e., prior to 1993 when the area was covered with asphalt pavement);

- Page 7, paragraph 5 (Water Quality Division Files): white water was historically generated on site through the manufacturing of felt paper and although this waste stream was connected to the sanitary sewer in 1971, paper mill operations were reportedly discontinued in 1985;

- Page 12, first bulleted paragraph under Conclusions/Recommendations: talc is not currently employed in the manufacturing process, talc was reportedly eliminated from the process in 1995; and

- Page 13, second to last paragraph: both of the dry wells used for purposes of storm water control have been registered with the DEQ: 11079-1, September 18, 2001 and 11079-2, May 2, 2003 (refer to Attachment 2). A Class V Pre-Closure Notification Form was submitted to the DEQ on April 29, 2003 (Attachment 3) to formally close these dry wells. Are they closed?

In addition to the above-noted points of clarification, as a result of a recent review of site historical records, CertainTeed (GS Roofing) has discovered the following information that DEQ might consider responsive to Mr. Mark Pugh's letter of April 23, 2002.

1. Attachment No. 4 provides some additional historical information regarding land-filling activities conducted during and prior to Genstar's ownership on the eastern portion of the facility. Purportedly, various materials common to the manufacture of roofing products were used as fill material.

2. Prior to expanding and paving the outdoor finished product storage area in 1993, GS Roofing conducted iterative subsurface investigations (either geotechnical or environmental) in the former fill area on the eastern portion of the facility. The first of these investigations was a geotechnical test-pitting program conducted in December 1992. This assessment incorporated the excavation of seven test pits extending along the eastern portion of the site (bordered by Saltzman Creek, the facility

buildings, Front Avenue and the Willamette River). The consultant (Applied Geotechnology Inc.) reported (Attachment 5) observing an "oily substance" and "groundwater" seeping into test pit number six, located proximal to the south-central portion of the investigation area. Reportedly no soil or ground-water samples were collected and analyzed by Applied Geotechnology, Inc.

3. In response to the above-noted observation, GS Roofing retained De Mininis, Inc. in December 1992 to collect water samples assumedly from test pit number six. As described in Attachment 6, five water samples were collected from the test pit, with each of the samples submitted to Oregon Analytical Laboratory for different analytes including: semi-volatile organic compounds (EPA Method 625/8270); volatile organic compounds (EPA Method 624/8240); TCLP Metals (EPA Methods 1311/6010/7470); TPH (EPA Method 418.1); and PCB (EPA Method 3510/8080). Analytical results demonstrated the presence of 860 ppm of TPH and 1 ppm of PCB in the test pit water samples.

4. To further assess the occurrence and significance of conditions documented in the December 1992 geotechnical and environmental investigations, GS Roofing retained De Minimis to conduct an expanded subsurface investigation in January 1993 (Attachment 7). This investigation resulted in the excavation of five test pits and the collection of eight soil samples. Each soil sample was subjected to TPH and PCB analysis by Oregon Analytical Laboratory. Analytical results demonstrated TPH concentrations ranging from none detected (< 3 mg/kg) to 23,000 mg/kg and PCB concentrations ranging from none detected (< 0.05 mg/kg) to 3.0 mg/kg. An annotation on the PCB laboratory reporting sheets indicates that the results were preliminary and the laboratory was re-running the three samples that exhibited detectable PCB concentrations.

5. In a January 1993 facsimile (Attachment 8), De Minimis transmitted the soil analytical data to GS Roofing, noting that an apparent "lab error" had occurred and that Oregon Analytical Laboratory was re-running the PCB analysis for at least one sample (S-2 from Test Pit No. 2). A laboratory data sheet, bearing a review date of 1/14/93, reported a PCB concentration for sample S-2 (Test Pit No. 2) of 0.59 mg/kg (preliminary findings reported 3.0 mg/kg).

6. In an April 1996 letter from De Minimis to GS Roofing (Attachment 9), De Minimis summarized the analytical data generated in conjunction with the January 1993 test-pitting and soil sampling program, specifically referencing the re-analysis of three soil samples for PCBs.

7. On March 6, 1998, GS Roofing obtained two permits from Hillsboro Landfill, Inc. to dispose of non-hazardous materials (Attachment 10). Permit No. 4055 was issued to dispose of one ton (three drums) of petroleum-contaminated soil. The origin of these soils is not currently known, but they were likely generated either during the 1992/1993 test-pitting investigations or the previous UST decommissioning activities. Prior to disposal, a sample of these soils (identified as MW-7) demonstrated the absence of TCLP lead. A second permit (No. 1696) was issued contemporaneously by Hillsboro Landfill, Inc. to dispose of 18 tons of "solidified asphalt residue and hardened asphalt." No analytical data are currently available in the GS Roofing files for this material.

The principal objectives of CertainTeed's Expanded Preliminary Assessment include:

1. determine the nature, extent and mobility of materials utilized as fill on the eastern portion of the site;

2. evaluate the presence/absence of subsurface impact (and, if present, constituent mobility) proximal to the former bunker fuel AST;

3. investigate and close the registered storm water UIC dry wells in accordance with applicable federal and state regulations;

4. review and evaluate EPA's 1998 Willamette River sediment data and the derivation of the "Portland Harbor Baseline Maximum" values; and

5. assess the impact on soil and ground-water quality beneath the GS Roofing facility attributable to upgradient responsible parties (e.g., the Willbridge Bulk Fuel Area).

These objectives will be achieved, in part, through: 1) review of existing reports/data; 2) application of surface geophysical techniques to delineate the extent of fill in the eastern portion of the property; 3) installation of soil borings and monitoring wells; 4) collection and analysis of soil and ground-water samples; and 5) fate and transport (mobility) analysis of site related contaminants.

As previously noted, CertainTeed will keep DEQ informed regarding the progress of the Expanded Preliminary Assessment and may, as appropriate, solicit DEQ's review at critical junctures in the assessment process. Should you have any questions regarding this document, the associated attachments or the scope of work for the XPA, please do not hesitate to contact me.

Sincerely,

FORENSIC ENVIRONMENTAL SERVICES, INC.

Thomas F. Maguire, C.P.G., LSP
President

TFM/bgm

Attachments

cc: Anthony Aldridge
Daniel Pofelski
Ronald Sanders
Martha Bixby
Lauren Alterman, Esq.

Attachment 1

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471

March 15, 2001

DONALD KUTYS
ST. GOBAIN CORPORATION
750 EAST SWEDESFORD RD
VALLEY FORGE, PENNSYLVANIA 19482

RE: GS Roofing
DEQ File # 26-90-0119

Dear Mr. Kutys:

The DEQ has finished a comprehensive review of the file for the leaking underground storage tank cleanup project located at 6350 NW Front Avenue, Portland. Based on our review we have concluded the site has been investigated, cleaned up, and evaluated in accordance with Oregon Administrative Rules 340-122-0205 through 340-122-0360 and that no further action is required at this time. This determination is the result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. In April 1990, a 1,000 gallon gasoline underground storage tank (UST) located near the southwest corner of the GS Roofing manufacturing plant was decommissioned and removed by Chemical Processors Incorporated. Soil immediately surrounding the tank was observed to be contaminated with gasoline at concentrations ranging up to 2,100 parts per million. The DEQ was subsequently notified of the release on April 5, 1990.

2. A 2,000 gallon diesel UST located northwest of the boiler room was decommissioned and removed in August 1991 by Omni Environmental. Prior to the decommissioning an environmental assessment conducted in the vicinity of the tank had discovered low to moderate levels of diesel (maximum of 2800 ppm TPH-D) and gasoline contamination (maximum of 260 ppm TPH-G). During the decommissioning, diesel contamination was detected in soils surrounding the tank, and approximately 10 cubic yards of petroleum contaminated soil (PCS) was excavated and disposed of at the Hillsboro Landfill. Soil samples collected from the excavation walls detected a maximum diesel concentration of 5800 ppm. To further delineate the extent of soil contamination remaining after excavating the 10 yards of PCS, five additional soil borings were placed in the vicinity of the former diesel tank. No contamination was detected in these borings indicating the pocket of diesel PCS remaining is relatively small.

3. On April 23, 1992, eighty cubic yards of PCS was excavated from around the former location of the gasoline UST and disposed of at the Hillsboro Landfill. The vadose zone contamination was successfully removed, however, significant concentrations of gasoline

contamination (TPH-G) were detected within a 3-4 foot layer at the water table immediately downgradient of the release area. This contamination appears to have migrated as a result of groundwater transport and is located 9-12 feet below ground surface. Historical sampling of this impacted area has detected TPH-G levels as high as 12,000 ppm, while more recent sampling conducted in November 2000 found a maximum concentration of 2,520 ppm TPH-G.

4. In February 1992, six monitoring wells were installed by Omni Environmental Services. Four wells to monitor groundwater contamination associated with the release from the gasoline UST and two wells to monitor groundwater contamination associated with the diesel release. In February 1995, an additional four wells were installed downgradient of the gasoline release area.

5. Groundwater monitoring associated with the diesel release (monitoring wells MW-4 and MW-5) did not detect the presence of any contaminants in groundwater at levels exceeding their respective risk-based concentrations. The list of contaminants monitored for included polynuclear aromatic hydrocarbons (PAHs), benzene, toluene, ethylbenzene, xylenes (BTEX), EDB, EDC and MTBE.

6. Groundwater monitoring associated with the gasoline release (MW-1 through MW-10, excluding MW-4 and MW-5) has consistently detected gasoline contamination in groundwater over the approximately 10 year period of monitoring. Benzene, identified as the primary contaminant of concern at the site, has been detected in groundwater up to a maximum concentration of 2,400 micrograms per liter (ug/l). In October 1997, the size of the groundwater plume reached its maximum, extending 350 feet downgradient from its source. Subsequently, the plume has retracted in size and diminished in magnitude.

Risk-Based Evaluation

7. Beginning in July of 1998, the GS Roofing Corporation began collecting information for a risk-based evaluation of the site. The conceptual site model developed for the property indicated ingestion of shallow groundwater was not a complete exposure pathway. This conclusion was based on the absence of water wells in the vicinity of the site, the proximity to the Willamette River (absence of downgradient receptors), and that water for the facility is currently supplied by the City of Portland. Two industrial wells (currently unused) are located on the facility site. However, it was concluded the remaining contamination does not pose a risk to them based on their depth, cross-gradient location and distance from the plume of contamination.

8. The next most sensitive pathway identified by the risk-assessment was the indoor vapor intrusion pathway. The only contaminant of concern identified for this pathway was benzene. The commercial/industrial risk-based standard for benzene in groundwater deemed protective for the vapor intrusion pathway is 1200 ppb, while the concentration in soil has been calculated to be .5 mg/kg. BTEX sampling conducted in 1991 by Omni Environmental

and in 2000 by the IT Corporation detected benzene in soil at a maximum concentration of .195 mg/kg, well below the .5 mg/kg screening level. With the exception of MW-8 during the October 1997 sampling event, benzene levels in groundwater have not exceeded the commercial vapor intrusion screening level in the last five years. A statistical analysis of benzene data collected from MW-8, found a concentration of 244 ppb corresponded to the 90% upper confidence limit. Therefore, it complies with the screening level concentration of 1200 ppb.

9. The site was screened for potential ecological impacts and it was determined that ecological receptors were not at risk as a result of the petroleum release. The plume of groundwater contamination has fluctuated in its magnitude and extent over the monitoring period, however, there is no evidence it has ever extended to either Saltzman Creek to the south or the Willamette River to the east. In recent years, there has been a strong declining trend in groundwater BTEX concentrations, indicating the plume is attenuating, and retracting back towards the release area. This trend is expected to continue.

10. Based on site conditions and contaminant levels, no other pathways of concern were identified by the IT Corporation risk assessment. The DEQ concurs with this conclusion.

11. Beginning in August 1996, monitoring data collected from MW-1 indicated a sharp increase in BTEX levels that was sustained for the next two years. This well is considered an upgradient well used primarily for establishing the quality of water flowing on to the site. Based on the MW-1 sampling results, the owners of the Willbridge Bulk Fuel Terminal was asked to investigate whether contamination was migrating off of there facility site on to the GS Roofing property. Soil and groundwater data collected by the IT Corporation in November 1999 confirmed contamination is migrating from the Willbridge Terminal and is affecting the western portion of the GS Roofing property.

Petroleum contaminated soil and groundwater remain on the site, however, based on the uses of the property, it appears that this contamination does not pose a significant risk to human health or the environment. Although the beneficial use determination indicated development of groundwater resources is unlikely, any wells that may be installed in the future should not be drilled in the vicinity of the residual soil and groundwater contamination, until it can be confirmed this contamination has sufficiently attenuated. In addition, any PCS excavated from the site must be managed and disposed of in accordance with the rules and policies of the DEQ.

You may want to consider leaving part of the monitoring well network in place to monitor the off-site groundwater impacts associated with the petroleum releases from the Willbridge facility. The Willbridge project is being overseen by Jill Kiernan of the DEQ Site Response Section.

The Department's determination will not be applicable if new or undisclosed facts show the cleanup does not comply with the referenced rules. The Department determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in your reports.

Please note that pursuant to OAR 340-122-360(2), a copy of this report must be retained until ten (10) years after the first transfer of the property. We recommend that a copy of this information be maintained with the permanent property records.

If this letter requires further explanation, I can be reached at (503) 229-5527.

Sincerely,

Henning Larsen
Hydrogeologist

Andree Pollock, Manager
UST Cleanup and Compliance

cc: Jeff Lower
IT Corporation
15055 SW Sequoia Parkway, Suite 140
Portland, OR 97224-7155

Jill Kiernan
DEQ – Northwest Region - Site Response

Attachment 2

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TDD (503) 229-6993

September 18, 2001

Daniel Pofelski
G.S. Roofing Company/CertainTeed
6350 NW Front Ave.
Portland, OR 97210

Facility at: 6350 NW Front Avenue, Portland

Dear Mr. Pofelski:

Thank you for submitting a registration form for the Underground Injection Control (UIC) system at your facility. The following table shows your UIC identification number combined with the injection system information you submitted. Generally, each facility is issued one UIC number; the various injection systems at that facility are then identified sequentially -1, -2, -3, etc. Please reference this number in future correspondence and retain this letter, or a copy of it, on site should your facility be inspected.

Well #	*Type Code*	*Status*	*Location*
11079-1	5D2	Active	West Warehouse

Please note that you are required to do the following:

- Update registration information whenever a change of ownership, change of land use, or closure of your injection system takes place.
- Maintain and operate each injection system to provide protection of groundwater resources.
- If this facility is sold or rented, notify the next owner about the registered injection system.

In the event a substance is spilled which may contaminate groundwater, contact the closest DEQ regional office and ask for the duty officer at the Northwest Region office: (503) 229-5263.

Based on the information you have sent to DEQ, your injection system has qualified as rule authorized under OAR 340-44. If you have any questions about this letter, please contact Barbara Priest at (503) 229-5945, or toll free inside Oregon at 1-800-452-4011.

Sincerely,

Barbara Priest

Barbara Priest
UIC Program Coordinator, Water Quality Division

DEQ USE ONLY
Registration #:
File #:
Mail ID #2/#9:
DOC Conf.:
Note:

UNDERGROUND INJECTION CONTROL REGISTRATION
Storm Water Drainage Systems

Oregon Department of Environmental Quality
(see pp. 3 - 4 for detailed instructions)

DEQ USE ONLY
Received:
☐ IND ☐ DOM ☐ UIC:
Notes:

A. FACILITY NAME, LOCATION & CONTACT

1. Legal Name: G.S.Roofing Company
2. Common Name: CertainTeed Corporation
3. Facility Physical Address: 6350 NW Front Ave
   City, State, Zip Code: Portland, OR 97210
4. Facility Mailing Address: 6350 NW Front Ave
   City, State, Zip Code: Portland, OR 97210
5. Latitude: 45 degrees 34 minutes 13N seconds Longitude: -122 degrees 44 minutes 37W seconds
6. Facility Contact Name: Anthony Aldridge
   Contact Telephone #: (503)243-5244
   Fax #: (503)248-9271
7. Responsible Official Name: Daniel Pofelski
   Address: 6350 NW Front Avenue
   City, State, Zip Code: Portland, OR 97210

B. FACILITY DESCRIPTION (ATTACH DOCUMENTS AS NEEDED)

1. SIC code: 2952 or NAICS code: Secondary SIC/NAICS code:
2. Briefly describe the nature of business at this facility: Production of roofing products including asphalt based shingles and rolls.
3. Briefly describe the types of materials, products, and wastes handled at the facility: Heated asphalt, fiberglass rolls, crushed limestone, sand, and zinc. Oil & sludge is recycled.
4. Land use zoning of facility: ☒ Industrial ☐ Commercial ☐ Residential ☐ Other:
5. Drinking water source: Monthly average usage (gal./day): ____ ☒ Public water ☐ Private Well
6. Process water source: Monthly average usage (gal./day): ____ ☒ Public water ☐ Private Well ☐ Recycled or Reclaimed
7. Depth to winter high water table: ____ feet If not available, average depth to groundwater: 10 feet
8. Indicate if present: ☒ UIC spill prevention/response plan ☒ Employee training on spill plan ☐ Plug(s) or block(s) for UIC system
   ☒ Spill clean up supplies: Spill Response Kit ☒ Containment facilities: Berms, dikes, drip pans
9. Maintenance program and schedule for UIC system(s): Monthly maintenance of engineering controls, regular cleaning of treatment measures, draining of runoff to systems
10. Does an adequate confinement barrier or filtration medium exist at the site to protect groundwater? ☒ YES ☐ NO ☐ DO NOT KNOW
    If "YES," attach relevant documentation. Roof stormwater drainage only
11. Is connection to or construction of a surface discharging storm sewer feasible? ☒ YES ☐ NO
    If "NO," briefly explain or attach relevant documentation:
12. List any other DEQ or public agency permits applied for or issued to this facility: NPDES #100-J regulating non-contact cooling water, NPDES 1200-Z

C. UNDERGROUND INJECTION CONTROL INFORMATION – Go to page 2 of this form.

To expedite the registration of your facility, please fill out this form in its entirety.

D. SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

I hereby certify that the information contained in this registration is true and correct to the best of my knowledge and belief.

Daniel Pofelski
Name of Legally Authorized Representative (Type or Print)

Plant Operations Manager
Title

Daniel V Pofelski
Signature of Legally Authorized Representative

8/23/01
Date

UIC REGISTRATION FOR STORM WATER DRAINAGE SYSTEMS

Oregon Department of Environmental Quality

(See pp. 3-4 for detailed instructions)

LEGAL NAME: G.S. Roofing Company

C. UNDERGROUND INJECTION CONTROL INFORMATION

Attach a facility map that clearly identifies the location of each UIC system by name or number.
Provide the information requested below for each UIC storm water drainage system. Attach additional copies of this sheet if necessary.

UIC SYSTEM # or NAME: _____ **INSTALLATION DATE:** _____

1. Latitude: 45 degrees 34 minutes 13N seconds
   Longitude: -122 degrees 44 minutes 37W seconds
2. Type: ☒ Dry well/sump ☐ Drill hole ☐ Infiltration trench ☐ Other surface discharge
3. Drainage Area: ☒ Roof drain only ☐ Parking area only ☐ Other, specify: _____
4. Distance to nearest: Domestic/public water well: none w/in 100F setback
   Wetland: 1000y Surface water(s): 1000 yrd
5. Status: (see instructions for status definition)
   ☐ Planning stage ☐ Under construction ☒ Active ☐ Not in use ☐ Temporarily Abandoned ☐ Permanently Abandoned/Decommissioned (date & method): _____
6. Characteristics:
   Depth: 4 ft Diameter: 2.5 ft
   Design drainage rate: unknown(no design plans)
   Size of impervious area drained: appox. 200 ft. sq.
   Type of treatment prior to discharge: none

UIC SYSTEM # or NAME: _____ **INSTALLATION DATE:** _____

1. Latitude: _____ degrees _____ minutes _____ seconds
   Longitude: _____ degrees _____ minutes _____ seconds
2. Type: ☐ Dry well/sump ☐ Drill hole ☐ Infiltration trench ☐ Other surface discharge
3. Drainage Area: ☐ Roof drain only ☐ Parking area only ☐ Other, specify: _____
4. Distance to nearest: Domestic/public water well: _____
   Wetland: _____ Surface water(s): _____
5. Status: (see instructions for status definition)
   ☐ Planning stage ☐ Under construction ☐ Active ☐ Not in use ☐ Temporarily Abandoned ☐ Permanently Abandoned/Decommissioned (date & method): _____
6. Characteristics:
   Depth: _____ ft Diameter: _____ ft
   Design drainage rate: _____
   Size of impervious area drained: _____
   Type of treatment prior to discharge: _____

UIC SYSTEM # or NAME: _____ **INSTALLATION DATE:** _____

1. Latitude: _____ degrees _____ minutes _____ seconds
   Longitude: _____ degrees _____ minutes _____ seconds
2. Type: ☐ Dry well/sump ☐ Drill hole ☐ Infiltration trench ☐ Other surface discharge
3. Drainage Area: ☐ Roof drain only ☐ Parking area only ☐ Other, specify: _____
4. Distance to nearest: Domestic/public water well: _____
   Wetland: _____ Surface water(s): _____
5. Status: (see instructions for status definition)
   ☐ Planning stage ☐ Under construction ☐ Active ☐ Not in use ☐ Temporarily Abandoned ☐ Permanently Abandoned/Decommissioned (date & method): _____
6. Characteristics:
   Depth: _____ ft Diameter: _____ ft
   Design drainage rate: _____
   Size of impervious area drained: _____
   Type of treatment prior to discharge: _____

Oregon
Theodore R. Kulongoski, Governor

Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204-1390
503-229-5696
TTY 503-229-6993

May 2, 2003

Daniel Pofelski
Certainteed
6350 NW Front Avenue
Portland, Oregon 97210

UIC Registration for: G.S. Roofing

Dear Mr. Pofelski:

Thank you for submitting a registration form for the additional Underground Injection Control (UIC) system at your facility. The following table shows your UIC identification number combined with the injection system information you submitted. Generally, each facility is issued one UIC number; the various injection systems at that facility are then identified sequentially -1, -2, -3, etc. Please reference this number in future correspondence and retain this letter, or a copy of it, on site should your facility be inspected.

UIC #	Type Code	Status	Location
11079-1	5D2 (storm water)	Active	roof
11079-2	5D2	Active	roof

Please note that you are required to do the following:

- Update registration information whenever a change of ownership, change of land use, or closure of your injection system takes place.
- Maintain and operate each injection system to provide protection of groundwater resources. Failure to do so could jeopardize rule authorized status.
- If this facility is sold or rented, notify the next owner about the registered injection system.

In the event a substance is spilled which may contaminate groundwater, contact the closest DEQ regional office and ask for the duty officer at the Northwest Region office: (503) 229-5263 and call Oregon Emergency Management at (503) 378-6377 or (800) 452-0311.

Based on the information you have sent to DEQ, your injection system has qualified as rule authorized under OAR 340-44. Please check with your local government to see if they have additional requirements. If you have any questions about this letter, please contact me at (503) 229-5945, or toll free inside Oregon at 1-800-452-4011.

Sincerely,

Barbara Priest, UIC Program Coordinator
Water Quality Division

cc: Neil Mullane, DEQ NWR
Anthony Aldridge, Certainteed

Attachment 3

DEQ USE ONLY
Registration #:
File #:
Multi ID #2/#3:
DOC Cont.:
Notes:

Oregon Department of Environmental Quality

DEQ USE ONLY
Received:
☐ IND ☐ DOM ☐ UIC
Notes:

CLASS V PRE-CLOSURE NOTIFICATION FORM

1. Facility Legal Name: G.S. Roofing Company
2. Common Name: CertainTeed Corporation
3. Facility Physical Address: 6350 NW Front Avenue
   City, State, Zip Code: Portland, OR 97210
4. Facility Mailing Address: 6350 NW Front Avenue
   City, State, Zip Code: Portland, OR 97214
5. Name of Owner/Operator: Anthony Aldridge
   Address: 6350 NW Front Avenue
   City, State, Zip Code: Portland, OR 97210
6. Phone Number: (503)243-5244
   Fax Number: (503)248-9271
   e-mail address: anthony.n.aldridge@saint-gobain.com
7. Legal Contact: Daniel Pofeleki Phone Number: (503)243-5235

FACILITY DESCRIPTION (ATTACH DOCUMENTS AS NEEDED)

1. Latitude: 45 degrees 34 minutes 13N seconds Longitude: -122 degrees 44 minutes 37W seconds
2. Type of UIC System: 5D2 (see list on page 2)
3. Injection/Disposal System Design (check all that apply):
   ☒ Drywell or sump ☐ Auto floor drain ☐ Cesspool ☐ Sewer drill hole ☐ Septic tank/drainfield/leachfield ☐ Other
4. Number of injection systems: 1 (with 2 intakes)
5. Year of construction: approx. 1980 Proposed date of injection system closure: March 15, 2003
6. Average flow: ? gallons/day *unknown, no design plans
7. Type of closure (check all that apply):
   ☒ Sample Fluids/sediments
   ☒ Appropriate disposal of remaining fluids/sediments
   ☒ Remove contaminated soil
   ☐ Conversion to other well type
   ☐ Pump out/fill with rocks and seal
   ☐ Attach to a municipal system
   ☐ Clean out
   ☐ Install permanent plug
   ☒ Other (describe): Fill w/cement, install new intake system pumped to oil/water separator
8. Attach a brief description of how the injection system will be closed. A sampling plan is required for closures of systems serving auto drains or for industrial use.
   ☒ Attached
9. List any other DEQ or public agency permits applied for or issued to this facility: NPDES 100-J regulating non-contact cooling water, NPDES 1200-Z

SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE

I hereby certify that the information contained in this registration is true and correct to the best of my knowledge and belief.

Daniel Pofeleki
Name of Legally Authorized Representative (type or print)

Plant Manager
Title

Signature of Legally Authorized Representative

Date

April 29, 2003

Mr. Greg Geist
Oregon Department of Environmental Quality
2020 SW Fourth Avenue
Portland, Oregon 97201-4987

Subject: GS Roofing Manufacturing
Portland, Oregon

Dear Mr. Geist

Enclosed please find the Class V Pre-Closure Notification form, Site map, photos, and work plan outlining the closure of two dry wells at GS roofing Company in Portland, Oregon. The dry wells are currently registered with DEQ as two Underground Injection Control (UIC) systems, well identification number 11079-1

The proposed closure of the dry wells includes the following plan:

- Both catch basins to the dry wells and the entire dry well system will be emptied of all material and sediment. One composite sample will be collected from the material and profiled for disposal.

- All removed material will be stored at the Site in a 55-gallon drum until the waste profile can be determined. If the material is determined to contain hazardous waste, it will be removed by Onyx Environmental for proper disposal.

- One discrete soil sample will be collected from the native soils 12" below the base of each dry well (2 samples total) using a hand-operated soil auger. Each sample will be analyzed for thirteen Priority Pollutant metals plus cobalt and magnesium (method 6020), dioxin (method 1613), pesticides/PCB (method 8081/8082), asbestos (PCM), cyanide (method 9010), volatile organic compounds (method 8260), and semi-volatiles (method 82700) by North Creek Analytical. The results will be compared to Oregon DEQ Risk Based Cleanup Levels (OAR 340-122-0205 through -0360) and EPA Region 9 Preliminary Remediation Goals (PRGs). Soils with analytes that exceed applicable cleanup levels will be remediated by removal or other means before decommissioning the dry wells.

- Upon verification that soils beneath the dry wells meet the applicable cleanup levels, the entire dry well system will be filled with cement and closed permanently.

- A new catch basin will be installed in the adjacent area. This new catch basin will be independent of the current storm water collection system, and will be pumped to the oil/water separator to be treated.

- All laboratory analytical data and the drilling invoice will be forwarded to DEQ to document the closure of the dry well, along with a report signed by an Oregon registered Geologist documenting the closure of activities.

GS Roofing would like to begin the fieldwork related to the closure of the dry well by May15,2003. Mobilization will be initiated within one week of your authorization to proceed.

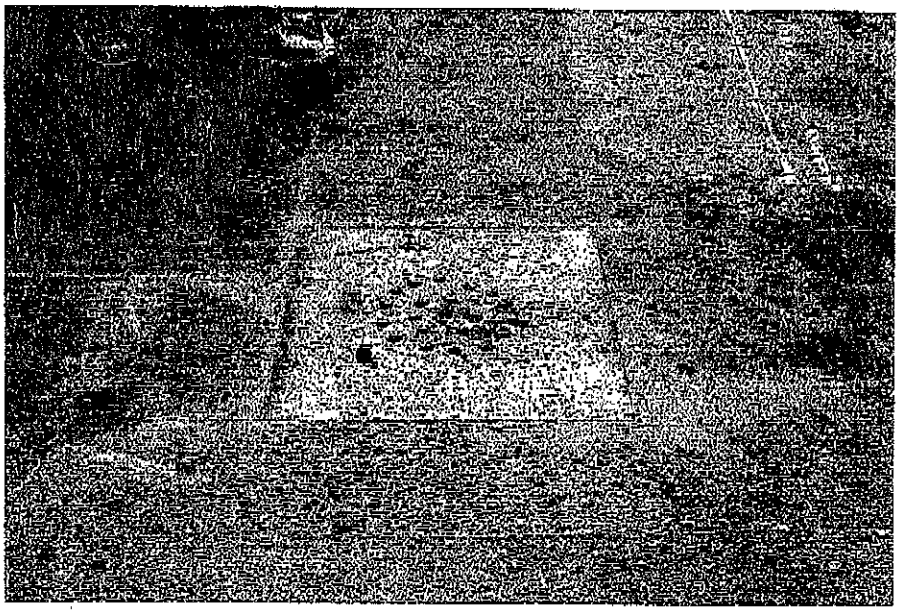
Please feel free to contact me at (503) 243-5244 with comments and questions you may have on the enclosed information.

Sincerely,

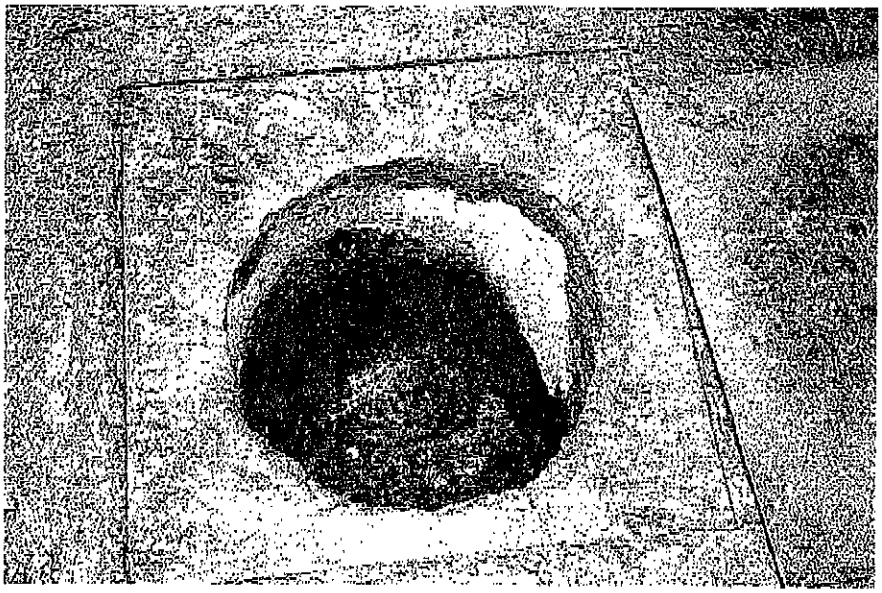
Anthony Aldridge
Safety, Quality, Environmental Manager

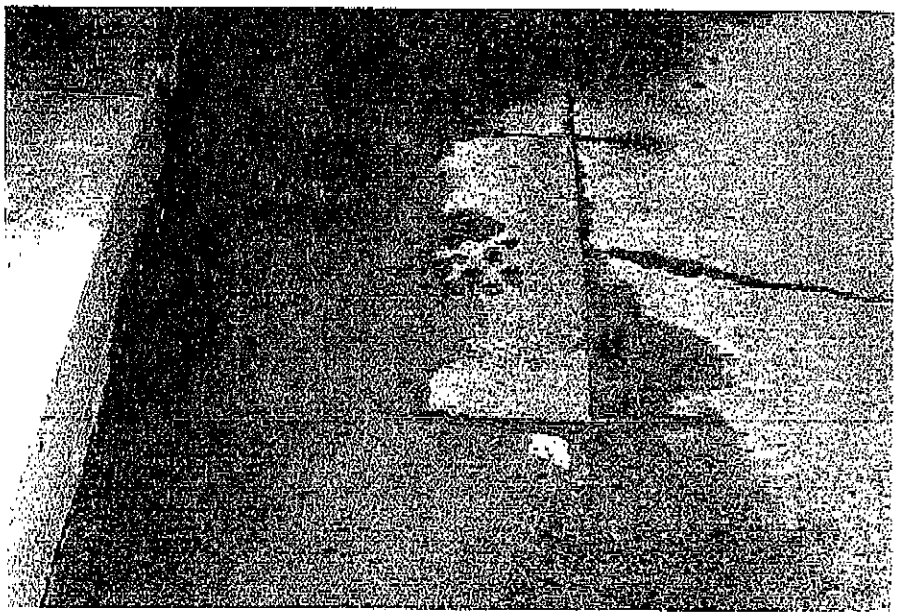
Enclosure

cc: Barbara Priest, UIC Program Coordinator

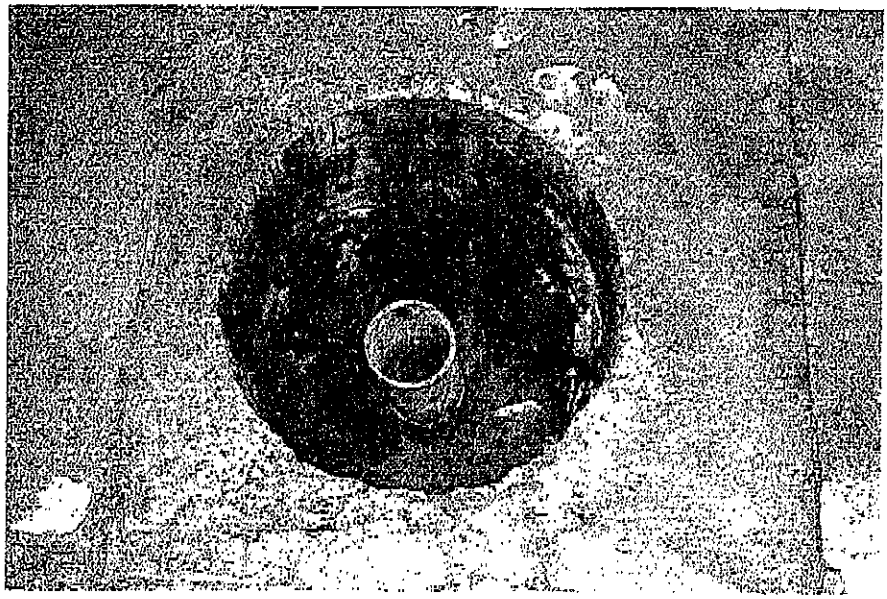


Dry well intake on the west side, with (above) and without (below) the lid on.





Dry well intake on the east side, with (above) and without (below) the lid on.



Attachment 4

GENSTAR
Waste Technology Group

Portland Regional Office
8305 S.E. Monterey — Suite 204
Portland, OR 97266
Telephone 503-659-1420

INTEROFFICE MEMO

DEQ

TO: David Sprinkle

Date: November 5, 1985

RECEIVED
NOV -7 1985

FROM: W. Alex Cross Alex

SUBJECT: Genstar Roofing, Portland, Oregon

As we previously discussed, there is a need to do some monitoring at the Genstar Roofing Products Plant in Portland. Our environmental audit done there this year recommended review of the site.

The site has been filled on an ongoing basis for the last 35 years. Some of the materials have been waste materials from roofing products manufacturing.

In keeping with the direction from Bruce Rogerson of Genstar Insurance, please suggest an appropriate program of site monitoring to determine if there are any impacts on ground and/or surface waters. The information should include what you would do, how long it would take, and what would be the initial costs of monitoring.

Enclosed for your review and comment are:

1. Letter from Genstar Roofing - Jim Diess, Plant Safety Director reporting on site history.
2. Copy of site plan.

Once Genstar Roofing has your suggested program, they will be in a position to set the process in motion.

W. Alex Cross
Vice President

WAC:do

cc: R. L. Lambden
T. G. Moore
J. F. McAnulty
J. I. Diess
B. Rogerson

FILE - [illegible]

Portland Plant/Dump site

Mr. Alex Cross

I have talked with some employees that have worked at this location for years and have come up with the following history.

Pacific Roofing started in 1939, they manufactured Asphalt, poured into 100# cartons, 150° to 190° melt point. Blackline, (asphalt roof coatings), and Roofing. Six Stills were used in the manufacture of Asphalt, these can be seen in the picture. The Felt Mill started operation in 1943.

Pabco bought the Plant in 1951. When Pabco was sold by Crown Zellerbach the name was changed to Fiberboard. Bird and Son bought the Plant in 1968 and as you know Genstar bought the Plant in 1985.

The area discussed was at the Southeast end of the Felt Mill building, South of the Railroad tracks in a line aprox. parallel to Front Ave. to the pallet storage area, then east for aprox. 150 feet to the dump box area, then North to the Railroad tracks, then West to the starting point at the bottom of the driveway to the Hydropulper.

H. Jay Edwards

Jay was not employed at this Plant when the dumping was done. He did, however remember that around 1962 some barrels of oil was buried along with some shingles.

Bill Becker

Bill worked in the Felt Mill, he remembers that he and others took wheel-barows of residue from the old beaters. Waste Paper was used in the process and a lot of wire, strings,rags,metal, and old shoes were dumped. He also said that asphalt from spills was dumped out there several times. As he recalls the Maint. Dept. built ramps out over the dump site, and added on as the area filled in.

Joe Heath Retired Felt Mill Supt.

Charles Burns

Norm Meyers

As Recalled, dumping took place in the late 1940's and early 1950's. These men didn't think very much was put out in the dump site after the mid 1950's. They brought up the same ideas of contents as the others I talked with. Some Asphalt from spills or non-spec. material was dumped. When the Stills were removed the asphalt was placed in the dump. As the Stills were cleened the carbon was dumped. Joe said he thought that there was some Blackline was dumped in containers in the site, he is not sure when. After the Felt Mill started the dump site was filled with the residue from the pulper, or beaters mostly. Some time under Pabco two railcars with off coler Asbest siding and Shingles were broke up and dumped in the site. It was stated that Shell Oil Co. did about ten years ago, dump some diatomatious earth that had been soaked with oil.

To the best of these mens recolections nothing was put out in the dump site that was thought to be dangerous, or harmful.

Jim Diess
Plant Safety Director

cc John McAnaulty
Bob Eysnogle

Attachment 5

Applied Geotechnology Inc.

December 2, 1992 1420.01

Mr. John Theis III, Process Engineer
GS Roofing Supply Company Inc.
6350 N.W. Front Avenue
Portland, Oregon 97210

SUBSURFACE EXPLORATION
6350 N.W. FRONT AVENUE
PORTLAND, OREGON

Dear Mr. Theis:

During the course of our geotechnical subsurface explorations provided for the proposed outdoor storage area at the above site, our field representative noticed an oily substance intermixed with the groundwater seeping into our test pit TP-6 from immediately under the existing AC paving. No analytical testing was performed on this substance. The hazard potential, source, and extent of the substance are unknown and cannot be determined with the exploration and sampling methods used for this investigation.

We bring this to your attention because the discovery might represent a situation that requires further study (additional exploration with sampling/testing). Additional explorations and analytical testing are required to identify the substance and assess its hazard potential. Sampling and analytical tests in accordance with EPA protocols are required. Depending on the outcome of the analytical tests, it may be necessary to notify ODEQ, perform additional assessments, and/or possibly undertake a future remedial cleanup.

We recommend that you perform a limited program to identify the substance. Please feel free to call us if you have any questions or if you wish us to develop a proposal for this limited work and an environmental assessment, if necessary.

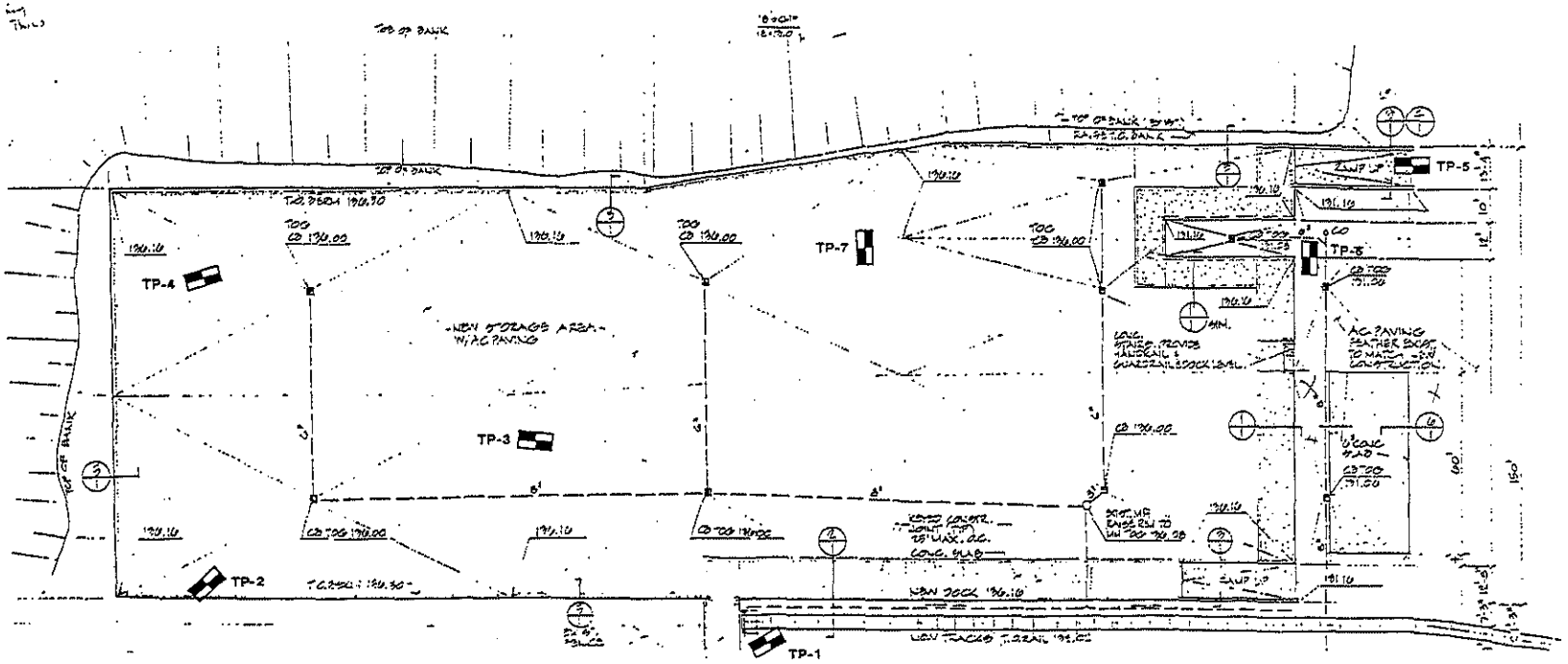
Very Truly Yours,

APPLIED GEOTECHNOLOGY INC.

Robert J. Strazer
Vice President

James D. Imbrie
Engineer

2510 S.W. First Avenue Portland, OR 97201 FAX 503/222-0141 Telephone 503/222-2820



N

LEGEND

TP-1 Exploratory Test Pit made by Applied Geotechnology Inc.

40 0 40 80

SCALE IN FEET

Applied Geotechnology Inc.
Geotechnical Engineering
Geology & Hydrogeology

EXPLORATION LOCATION PLAN

G.S. Roofing Storage Area
Portland, Oregon

FIGURE **2**

JOB NUMBER	DRAWN	APPROVED	DATE	REVISED	DATE
1420.01	KPW		11/30/92		

Attachment 6

DE MINIMIS INC.
ENVIRONMENTAL MANAGEMENT
34 NW 1ST AVE., SUITE 101
PORTLAND, OREGON 97209
(503) 295-4074

Mr. John Thies III
GS Roofing Products Inc.
6350 N.W. Front Avenue
Portland, Oregon 97210

RE: Sampling Results

Dear Mr. Thies,

The following is a summary of the water sample laboratory analyses performed for your site located at 6350 N.W. Front Avenue, Portland, Oregon on December 16, 1992. If you have any questions regarding any of the information contained in this letter, please feel free to contact me at your convenience.

Introduction

On December 16, 1992, De Minimis Inc. Environmental Management (DMI) was contracted by GS Roofing Products Inc. (client) to collect and have laboratory analyses performed on water samples obtained from the saturation zone of the undeveloped portion of the subject property to the south of their production facility. The request for sample analyses was apparently generated by unconfirmed reports by a geotechnical firm of a layer of oily soils encountered during a previous soils engineering study.

Sampling and Analyses

Five water samples were collected from a test pit dug into unconsolidated soils approximately three feet below ground surface (bgs) on the southern portion of the subject property. The weather was cold and snowing. Water apparently collected in the test pit due to surface drainage from the subject property into a drainage ditch located nearby.

Representative samples were obtained directly from the test pit by submerging a clean five-gallon plastic bucket and transferring it into appropriate containers. All sampling containers were sterile, glass liter-size bottles obtained from Oregon Analytical Laboratory (OAL), except the sample obtained for Volatiles EPA 8240 which required two glass VOA vials. The sampling containers were completely filled such that no headspace was present that would allow for the loss of volatiles. The sample bottles were then labeled and transferred to a chilled container for shipment via chain-of-custody to an off-site, EPA-certified, laboratory (OAL) for analyses later the same day.

It should be noted that the location and method used to obtain the samples were at the clients discretion and potentially compromised standard industry quality control protocol. However, for initial discovery techniques, it is believed that the quality control procedures used were adequate to ensure preliminary results.

Water samples were analyzed for the following constituents: Total Petroleum Hydrocarbons (TPH) DEQ Method 418.1; Volatile Organic Compounds EPA Method 8240; Semi-volatile Organic Compounds EPA Method 8270; Polychlorinated Biphenyls (PCB) EPA Method 3510/8080; and TCLP (toxicity characteristic leaching procedures) EPA Method 1311 with Heavy Metals analysis EPA 6010/7470. Results are tabulated in the following chart:

SAMPLE NO.	ANALYSES	RESULTS
W-1	Semi-volatiles EPA 625/8270	ND Non detect
W-2	Volatiles EPA 624/8240	ND Non detect
W-3	TCLP EPA 1311 6010/7470	ND Non detect
W-4	TPH EPA 418.1	860 ppm
W-5	PCB EPA 3510/8080	1 ppm

Interpretations

The sample analyses results for W-1 Semi-volatiles, W-2 Volatiles, and W-3 Heavy Metals, show 'non detects' indicating that none of the compounds tested for were present in those samples.

Sample W-5, tested for PCB content registered a content of 1 part per million (ppm) of polychlorinated biphenyls present in the sample. Current DEQ cleanup guidelines are set at levels of 0.7 ppm for industrial sites, and 0.08 ppm for residential sites. GS Roofing would be considered an industrial property according to current regulatory definitions.

Sample W-4, tested for Total Petroleum Hydrocarbons (TPH) 418.1 (oil), detected 860 ppm of oil based hydrocarbon compounds present in the sample. This level of contamination is above current cleanup guidelines established by DEQ.

De Minimis Inc.

Conclusions and Recommendations

Preliminary sampling collected from water seeping through unconsolidated soils in the undeveloped portion of the subject site indicate levels of oil and PCB content above regulatory cleanup guidelines. The owner of the property may be required to report the release to the environment to DEQ per Oregon Administrative Rules (OAR) 340-108-010, and is potentially liable for cleanup of the release per OAR 340-108-021 and 340-108-070.

As the most cost effective format, DMI recommends additional investigation into the subsurface soils, through a phased process, to determine the level and extent of potential contamination to the subject property. This can be accomplished by initially performing a number of test pits or soil borings with soils and potentially groundwater analyzed for the appropriate constituents. As further information becomes available, a data driven work plan can be developed as necessary. DMI does not recommend reporting a release to DEQ at this time until further information is available.

The data presented in this report was collected, analyzed, and interpreted following the standards of care, skill, and diligence ordinarily provided by a professional in the performance of similar services as of the time the services were performed. The results of this investigation are prefatory in nature and not intended to be all encompassing.

John, if you have any questions regarding the information contained in this report, please feel free to contact me at your convenience. Additionally, if you would like to meet for the purposes of developing a work plan, we would be pleased to present a proposal for further investigation for your consideration. Thank you for allowing us to present this information to you.

Sincerely,

Rick I. Johnson
President

Attachment 7

DE MINIMIS INC.
ENVIRONMENTAL MANAGEMENT
34 NW 1ST AVE., SUITE 101
PORTLAND, OREGON 97209
(503) 295-4074

January 14, 1993

Mr. John A. Thies, III
Process Engineer
GS Roofing Products Company, Inc.
6350 N.W. Front Avenue
Portland, Oregon 97210

RE: Soil Sampling Investigation and
Laboratory Test Results
GS Roofing Products Company, Inc.

Dear Mr. Thies,

Per your request, De Minimis Inc. (DMI) was contracted to provide environmental project management services for GS Roofing Products Company, Inc. (Client), 6350 N.W. Front Avenue, Portland, Oregon, 97210. The contracted services included obtaining soil samples from test pits at the subject site and analyses of these samples for the presence of petroleum hydrocarbons and polychlorinated biphenyls (PCBs).

The following is a review of the work performed at the site related to this project.

Test Pit Excavation and Field Work

On January 6, 1993, 8:35 A.M., DMI personnel arrived at the subject site and met with Mr. John A. Thies, Process Engineer and Client Representative, to review the soil sampling plan and on-site safety requirements. The excavation equipment, a backhoe, and the equipment operator, Mr. Mark McArthur, were provided by the Client. As per the instructions of the Client, four proposed test pit locations were shown to DMI personnel. At the Client's request, DMI personnel were to obtain representative soil samples from the proposed test pits. The weather was clear with temperatures in the mid-20's.

The following sampling procedure was followed by DMI personnel for all soil samples obtained. DMI personnel, wearing clean, surgical type, latex gloves, collected the soil samples into sterile, 9-ounce, Qorpak glass sample bottles with Teflon-lined lids, obtained from Oregon Analytical Laboratory (OAL). The samples were obtained from either the bucket of the backhoe or from the sidewalls of the test pits. Approximately 3-inches of soil was scraped from the exposed sampling surface and the underlying soil was rapidly transferred into the sample containers with minimal headspace, such that the loss of volatiles would be minimal. The sample containers were labeled and stored on ice in a cooler until shipped to OAL, an off-site, independent, EPA-certified laboratory, via chain-of-custody for analyses.

Excavation of Test Pit #1 started at 8:55 A.M. and was located approximately 20-feet to the southeast of the Original Test Pit, sampled by DMI personnel on December 16, 1992 (see Figure 1). An 12- to 18-inch corrugated pipe was encountered at 4-feet below ground surface (bgs) in Test Pit #1. The pipe was not observed to be damaged and the eastern terminus of this pipe was located in the ravine, approximately 11-feet to the east of Test Pit #1. No liquids were observed draining from the pipe. The upper 12- to 15-inches of soil was observed to be a damp, dark brown, clayey silt, intermixed with medium sand, shingle tabs, rock fragments, and apparent black, organic material. No visual or olfactory evidence of chemical contamination was observed in the upper layer, other than the shingle tabs. At a varying depth of 2- to 4-feet bgs, a damp, light brown, clayey silt was observed with no visual or olfactory evidence of chemical contamination noted. Sample S-5, 3-feet bgs, was subsequently obtained from this middle layer of Test Pit #1. Below the middle layer, at a depth of 9- to 10.5-feet bgs, a damp, dark brownish-gray, unconsolidated silty, medium to large grain sand was observed with 4- to 6-inch cobbles at the bottom of the excavation. At approximately 10-feet bgs, a light gray sand that appeared to be visually contaminated was observed, however, no olfactory evidence of contamination was noted. Sample S-1 was obtained 10.5-feet bgs from the center of Test Pit #1. Groundwater was not encountered in Test Pit #1. Test Pit #1 was subsequently filled with the excavated soil, as per the Client's instructions.

Excavation of Test Pit #2 was started at 9:45 A.M. and was located approximately 35-feet northeast of the Original Test Pit (see Figure 1). From the ground surface to 3-feet bgs, what appeared to be a damp, dark gray, clayey silt and fill material (consisting of shingle tabs, rocks ranging from 2-inch pebbles to 2-feet boulders, red brick fragments, and blackened chunks of wood) were observed. Mr. McArthur stated that the backhoe was leaking hydraulic oil/fluid from the cylinder on the main arm of the backhoe. Abundant fluid was observed on the arm of the backhoe and it appeared to be dripping off of the arm. Mr. McArthur showed DMI personnel a 5-gallon bucket of Chevron Hydraulic Oil AW, SO 68, High Pressure, that was subsequently used to refill the cylinder. DMI personnel notified and showed Mr. Thies the leaking cylinder. As per the Client's instructions, Test Pit #2 was continued with the procedure now including Mr. McArthur wiping off the arm of the backhoe prior to sampling and DMI sampling from the middle of the soil in the bucket. Sample S-2, 3-feet bgs, was obtained directly from the sidewall of Test Pit #2 and appeared to be visually contaminated, however, no olfactory evidence of contamination was noted. From 3- to 5-feet bgs, abundant concrete chunks, rocks, wood and brick fragments, and steel cable was observed. At 5-feet bgs, bright green chunks of soil were observed with the total volume of these chunks being approximately fist-size. Several of the green chunks were obtained from the excavation pile for Sample S-3. Mr. McArthur, in order to control the leakage on the backhoe, wrapped the cylinder on the backhoe arm with a sweatshirt and paper towels. Sample S-4 was obtained at 8.5-feet bgs and was a saturated, dark gray, clayey silt with medium intermixed sand. Sample S-4 appeared to be visually contaminated and a faint petroleum odor was noted. After Sample S-4 was obtained, a puddle (10" x 18") was observed at 8.5-feet bgs in Test Pit #2. No leaking, buried objects were observed in the excavation and the source and nature of the liquid were undetermined.

At 9-feet bgs, Mr. McArthur stated that refusal was encountered due to the abundant rocks and concrete chunks. Test Pit #2 was refilled with the excavated materials, as per the Client's instructions.

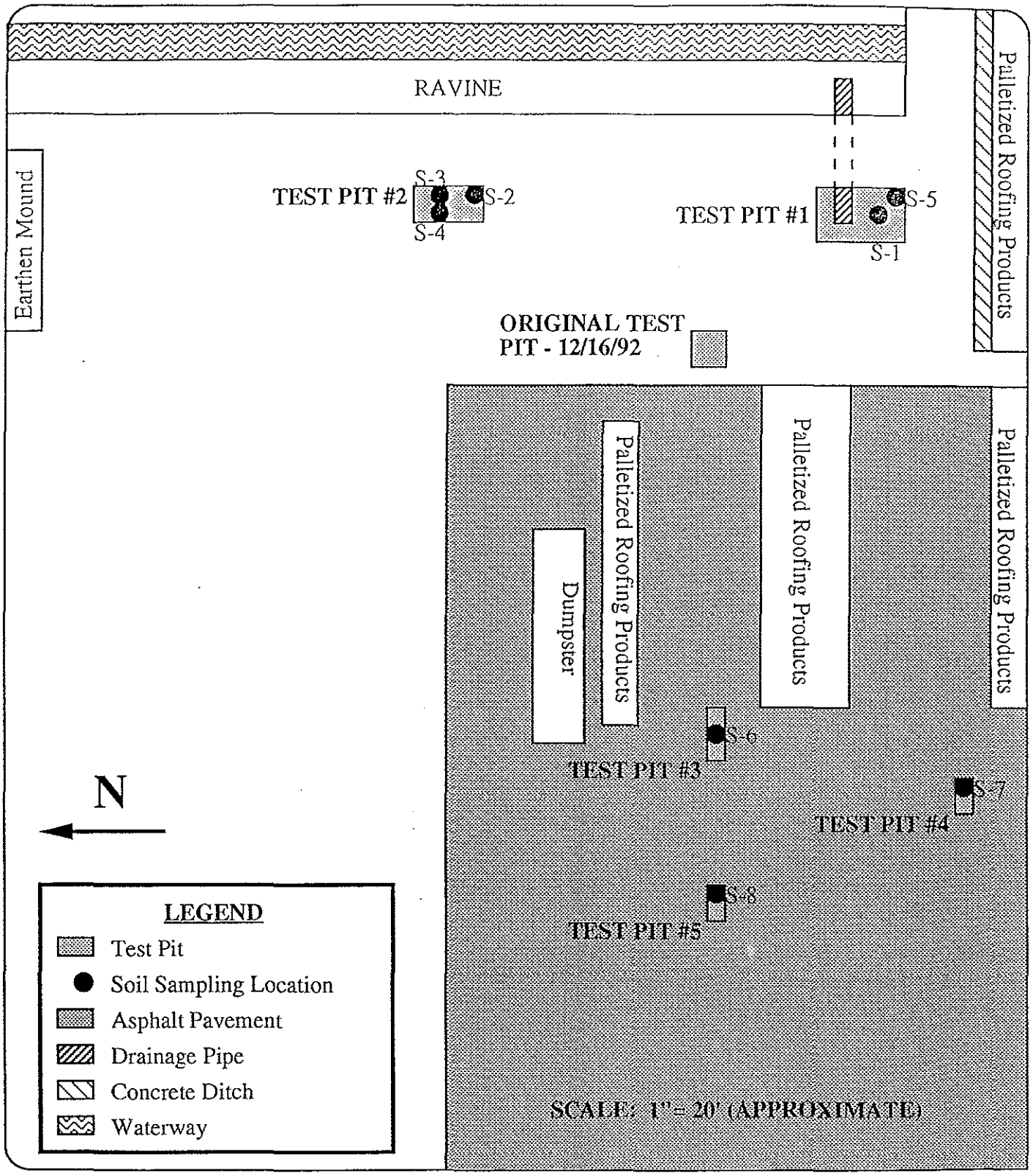
Excavation of Test Pit #3 was started at 1:55 P.M. and was located approximately 45-feet to the west of the Original Test Pit on the asphalt paved area (see Figure 1). Immediately underlying the asphalt pavement, corrugated metal fragments coated with a black, tarry substance were observed. Sample S-6, 2.5-feet bgs, was obtained from the sidewall of the excavation and was observed to be a damp, black, unconsolidated, large grain sand intermixed with wood and metal fragments, pebbles, and rock fragments. Sample S-6 appeared to be visually contaminated and a strong petroleum odor was noted. Groundwater was not encountered in Test Pit #3. The total depth of the excavation was 3-feet bgs and Test Pit #3 was refilled as per the Client's instructions.

Excavation of Test Pit #4 was started at 2:47 P.M. and was located approximately 33-feet to the southwest of Test Pit #3 (see Figure 1). The upper 1-foot of soil in Test Pit #4 was observed to be a damp, brown sand underlain by a damp, black sand. Sample S-7 was obtained 2-feet bgs from the sidewall of the test pit and was observed to be a damp, grayish-black, unconsolidated sand with wood, metal, and rock fragments. Sample S-7 appeared visually contaminated and a petroleum odor was noted. Test Pit #4 was excavated to a total depth of 2-feet bgs and groundwater was not encountered. Test Pit #4 was refilled as per the Client's instructions.

Mr. Thies requested that another test pit, Test Pit #5, be excavated approximately 18-feet to the west of Test Pit #3 (see Figure 1). Test Pit #5 was started at 3:32 P.M.. A damp, grayish-black, unconsolidated sand was encountered below the asphalt pavement to a depth of 1-foot bgs. Sample S-8 was obtained 1.5-feet bgs from the sidewall of the excavation. Sample S-8 was observed to be a damp, dark, grayish-black, unconsolidated sand with intermixed wood and rock fragments, and shingle tabs. Sample S-8 appeared visually contaminated and a petroleum odor was detected. Test Pit #5 was excavated to 1.5-feet bgs and no groundwater was encountered. Test Pit #5 was refilled with the excavated material as per the Client's instructions.

Soil Sample Analyses

The soil samples were analyzed by Oregon Analytical Laboratory (OAL), an independent, off-site, EPA-certified laboratory. The soil samples were analyzed for Total Petroleum Hydrocarbons (TPH) utilizing Oregon DEQ Method TPH-418.1 Modified and for PCBs utilizing EPA Methods 3540 and 8080. The complete OAL report is included with this report. Summaries of the OAL analyses are provided below and are reported in parts per million (ppm).



PROJECT NO. 100817 January 1993	**DE MINIMIS INC.** ENVIRONMENTAL MANAGEMENT 34 N.W. FIRST AVENUE SUITE 101 PORTLAND, OREGON 97209 503/295-4074	**Site Map** SOIL SAMPLING INVESTIGATION GS Roofing Products Company, Inc. Portland, Oregon	FIGURE **1**

Sample Identification	TPH (ppm)	PCB (ppm)
S-1, TP #1	28	Not Detected
S-2, TP #2	4,600	3.0 *
S-3, TP #2	5,400	Not Detected
S-4, TP #2	1,200	0.15
S-5, TP #1	Not Detected	Not Detected
S-6, TP #3	23,000	0.08
S-7, TP #4	18,000	Not Detected
S-8, TP #5	7,800	Not Detected

(*-Possible Lab Error)

Summary

On January 6, 1993, eight soil samples were obtained from GS Roofing Products Company, Inc., 6350 N.W. Front Avenue, Portland, Oregon. The samples were obtained from test pits that were at depths and locations per the Client's instructions. The Client requested that the soil samples be analyzed for Total Petroleum Hydrocarbons (TPH) and polychlorinated biphenyls (PCBs). The soil samples were delivered via chain-of-custody to Oregon Analytical Laboratory (OAL).

Samples S-2, S-4, and S-6 detected 3.0 ppm, 0.15 ppm, and 0.08 ppm PCBs, respectively. Current DEQ cleanup guidelines for PCB are 0.7 ppm for industrial sites, according to DEQ personnel pursuant to OAR 340-122-045.

Total Petroleum Hydrocarbons (TPH) were detected in all of the soil samples, excluding Sample S-5 in which no TPH was detected. The reported values for TPH range from 28 ppm to 23,000 ppm.

The data presented in this report was collected, analyzed, and interpreted following the standards of care, skill, and diligence ordinarily provided by a professional in the performance of similar services as of the time the services were performed. The results of this investigation are prefatory in nature and not intended to be all encompassing.

De Minimis Inc. is pleased to present the results of the Soil Sampling Investigation for GS Roofing Products Company, Inc.. If you have further questions regarding this report, please call me at your earliest convenience at (503) 295-4074.

Sincerely,

De MINIMIS INC.

Dale L. Haar, Geologist
Project Manager

Rick I. Johnson
President

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: RS
REVIEW DATE: 1.13.93

TOTAL PETROLEUM HYDROCARBONS (TPH)
BY OREGON DEQ TPH-418.1 MODIFIED

SAMPLE ID:	S-1 TEST PIT #1	S-2 TEST PIT #2	S-3 TEST PIT #2	S-4 TEST PIT #2	S-5 TEST PIT #1
OAL ID: 25-I351-	08669	08670	08671	08672	08673
SAMPLE DATE:	1/6/93	1/6/93	1/6/93	1/6/93	1/6/93
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
TPH IN MG/KG	28.	4600.	5400.	1200.	ND
ANALYST:	RJ	RJ	RJ	RJ	RJ

NA = NOT ANALYZED
ND = NONE DETECTED (<3 MG/KG)

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007
Phone 503-644-5300 • Fax 503-671-1404

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: RK
REVIEW DATE: 1.13.93

TOTAL PETROLEUM HYDROCARBONS (TPH)
BY OREGON DEQ TPH-418.1 MODIFIED

SAMPLE ID:	S-6 TEST PIT #3	S-7 TEST PIT #4	S-8 TEST PIT #5
OAL ID: 25-I351-	08674	08675	08676
SAMPLE DATE:	1/6/93	1/6/93	1/6/93
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/11/93	1/11/93	1/11/93
TPH IN MG/KG	23000.	18000.	7800.
ANALYST:	RJ	RJ	RJ

NA = NOT ANALYZED
ND = NONE DETECTED (<3 MG/KG)

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007
Phone 503-644-5300 • Fax 503-671-1404

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: CN For DM
REVIEW DATE: 1-13-93

PCB ANALYSIS OF SOLIDS
BY EPA METHODS 3540 AND 8080

SAMPLE ID:	S-1 TEST PIT #1	S-2 TEST PIT #2	S-3 TEST PIT #2	S-4 TEST PIT #2	S-5 TEST PIT #1
OAL ID: 25-I351-	08669	08670	08671	08672	08673
SAMPLE DATE:	1/6/93	1/6/93	1/6/93	1/6/93	1/6/93
MATRIX:	SOILS	SOIL	SOIL	SOIL	SOIL
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/12/93	1/12/93	1/12/93	1/12/93	1/12/93
PCB MG/KG	ND	3.0	ND	0.15	ND
SURR.RECOVERY %	103.	95.	94.	97.	95.
ANALYST:	CN	CN	CN	CN	CN

MG/KG = PPM
ND = NONE DETECTED(<0.05 MG/KG)
NA = NOT ANALYZED
MI = MATRIX INTERFERENCE WITH SURROGATE RECOVERY
SURROGATE(S) USED: TETRACHLORO-M-XYLENE AND/OR DECACHLOROBIPHENYL

Note: This is a preliminary data sheet; we are re running samples # 08670, 08672 08673 & 08674. I will reissue when complete.
Steve R Anderson

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007
Phone 503-644-5300 • Fax 503-671-1404

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: CN For DM
REVIEW DATE: 1-13-93

PCB ANALYSIS OF SOLIDS
BY EPA METHODS 3540 AND 8080

SAMPLE ID:	S-6 TEST PIT #3	S-7 TEST PIT #4	S-8 TEST PIT #5
OAL ID: 25-I351-	08674	08675	08676
SAMPLE DATE:	1/6/93	1/6/93	1/6/93
MATRIX:	SOIL	SOIL	SOIL
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/12/93	1/12/93	1/12/93
PCB MG/KG	0.08	ND	ND
SURR.RECOVERY %	89.	107.	97.
ANALYST:	CN	CN	CN

MG/KG = PPM
ND = NONE DETECTED(<0.05 MG/KG)
NA = NOT ANALYZED
MI = MATRIX INTERFERENCE WITH SURROGATE RECOVERY
SURROGATE(S) USED: TETRACHLORO-M-XYLENE AND/OR DECACHLOROBIPHENYL

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OAL Oregon Analytical Laboratory
14855 S.W. Old Scholls Ferry Rd.
Beaverton, Oregon 97007
(503) 644-5300
FAX (503) 671-1404

Chain of Custody Record
Laboratory Analysis Request

Client Information

Company: De Minimis Inc.
Contact: Dale L. Haas
Phone #: 295-4074

Project Name:
Project Number:
P.O. Number: 100817

Sampler's Name: Dale L. Haas
Signature: Dale L. Haas
Sampling Date: 1-6-93

Provide Verbal Results: ☒ Yes ☐ No
Provide FAX Results: ☒ Yes ☐ No

Comments:

Received @ 4°C: ☒ Yes ☐ No
Appropriate Containers: ☒ Yes ☐ No

Changed to 418.1 M 1/8/93 per Rick Johnson

	Sample #	Sample Description	Date	Time	OAL #	Matrix: Soil	Water	Other	TPH-HCID OAR/DEQ	TPH-G OAR/DEQ	TPH-D OAR/DEQ	TPH 418.1 MOD OAR/DEQ	TPH 418.1	BTEX 602/8020	Volatiles 624/8240	Semivolatiles 625/8270	Halogenated Volatiles 601/8010	Chlorinated Pesticides 608/8080	PCB 608/8080	TCLP (8) Metals	RUSH	Remarks
1	S-1	~~Test~~ Test pit #1	1-6-93	0940	25-2351 08669	X						S	X						X			
2	S-2	Test pit #2		1100	08670	X						S	X						X			
3	S-3	Test pit #2		1110	08671	X						S	X						X			
4	S-4	Test pit #2		1130	08672	X						S	X						X			
5	S-5	Test pit #1		1318	08673	X						S	X						X			
6	S-6	Test pit #3		1427	08674	X						S	X						X			
7	S-7	Test pit #4		1519	08675	X						S	X						X			
8	S-8	Test pit #5	↓	1615	08676	X						S	X						X			
9												S										
10																						

Relinquished
Signature: Dale L. Haas
Print Name: Dale L. Haas
Company: DeMinimis Inc
Date: 1-7-93
Time: 12:35 PM

Received
Signature: Grady Brown
Print Name: Grady Brown
Company: Andy's Delivery
Date: 01-07-93
Time: 1235 PM

Relinquished
Signature:
Print Name:
Company:
Date:
Time:

Received
Signature: Daniel Wood
Print Name:
Company: OAL
Date: 01-07-93
Time: 402

Relinquished
Signature:
Print Name:
Company:
Date:
Time:

Received
Signature:
Print Name:
Company:
Date:
Time:

Attachment 8

8

De MINIMIS INC.

ENVIRONMENTAL SERVICES

FACSIMILE
TRANSMISSION

TO	John Thies
COMPANY	GS Roofing Products
FAX NUMBER	248-9271
PHONE NUMBER	222-1307
FROM	Rick Johnson
COMPANY	De Minimis Inc.
FAX NUMBER	1-503-295-0112
PHONE NUMBER	1-503-295-4074

Total pages including cover sheet _6

COMMENTS

John,

Here are the lab analyses results that you requested be faxed to you. We will interpret the results tommorrow during our meeting. It appears that the "hit" on S-2 Test Pit # 2 for PCB is a lab error, they are re-running the test at no charge. I should have the results tommorrow. Thanks,

Rick

34 N.W. FIRST AVENUE, SUITE 101, PORTLAND, OREGON 97209
(503) 295-4074 • FAX (503) 295-0112

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: RS
REVIEW DATE: 1.13.93

TOTAL PETROLEUM HYDROCARBONS (TPH)
BY OREGON DEQ TPH-418.1 MODIFIED

SAMPLE ID:	S-1 TEST PIT #1	S-2 TEST PIT #2	S-3 TEST PIT #2	S-4 TEST PIT #2	S-5 TEST PIT #1
OAL ID: 25-I351-	08669	08670	08671	08672	08673
SAMPLE DATE:	1/6/93	1/6/93	1/6/93	1/6/93	1/6/93
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
TPH IN MG/KG	28.	4600.	5400.	1200.	ND
ANALYST:	RJ	RJ	RJ	RJ	RJ

NA = NOT ANALYZED
ND = NONE DETECTED (<3 MG/KG)

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: RS
REVIEW DATE: 1·13·93

TOTAL PETROLEUM HYDROCARBONS (TPH)
BY OREGON DEQ TPH-418.1 MODIFIED

SAMPLE ID:	S-6 TEST PIT #3	S-7 TEST PIT #4	S-8 TEST PIT #5
OAL ID: 25-I351-	08674	08675	08676
SAMPLE DATE:	1/6/93	1/6/93	1/6/93
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/11/93	1/11/93	1/11/93
TPH IN MG/KG	23000.	18000.	7800.
ANALYST:	RJ	RJ	RJ

NA = NOT ANALYZED
ND = NONE DETECTED (<3 MG/KG)

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: CN For DM
REVIEW DATE: 1-13-93

PCB ANALYSIS OF SOLIDS
BY EPA METHODS 3540 AND 8080

SAMPLE ID:	S-1 TEST PIT #1	S-2 TEST PIT #2	S-3 TEST PIT #2	S-4 TEST PIT #2	S-5 TEST PIT #1
OAL ID: 25-I351-	08669	08670	08671	08672	08673
SAMPLE DATE:	1/6/93	1/6/93	1/6/93	1/6/93	1/6/93
MATRIX:	SOILS	SOIL	SOIL	SOIL	SOIL
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/12/93	1/12/93	1/12/93	1/12/93	1/12/93
PCB MG/KG	ND	3.0	ND	0.15	ND
SURR.RECOVERY %	103.	95.	94.	97.	95.
ANALYST:	CN	CN	CN	CN	CN

MG/KG = PPM
ND = NONE DETECTED(<0.05 MG/KG)
NA = NOT ANALYZED
MI = MATRIX INTERFERENCE WITH SURROGATE RECOVERY
SURROGATE(S) USED: TETRACHLORO-M-XYLENE AND/OR DECACHLOROBIPHENYL

Note: This is a preliminary data sheet; we are re running samples # 08670, 08672 08673 & 08674. I will reissue when complete.
Steve R Anderson

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
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OAL

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34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: CN for DM
REVIEW DATE: 1-13-93

PCB ANALYSIS OF SOLIDS
BY EPA METHODS 3540 AND 8080

SAMPLE ID:	S-6 TEST PIT #3	S-7 TEST PIT #4	S-8 TEST PIT #5
OAL ID: 25-I351-	08674	08675	08676
SAMPLE DATE:	1/6/93	1/6/93	1/6/93
MATRIX:	SOIL	SOIL	SOIL
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/12/93	1/12/93	1/12/93
PCB MG/KG	0.08	ND	ND
SURR.RECOVERY %	89.	107.	97.
ANALYST:	CN	CN	CN

MG/KG = PPM
ND = NONE DETECTED(<0.05 MG/KG)
NA = NOT ANALYZED
MI = MATRIX INTERFERENCE WITH SURROGATE RECOVERY
SURROGATE(S) USED: TETRACHLORO-M-XYLENE AND/OR DECACHLOROBIPHENYL

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
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Oregon Analytical Laboratory
14855 S.W. Old Scholls Ferry Rd.
Beaverton, Oregon 97007
(503) 644-5000
FAX (503) 671-1404

CHAIN OF CUSTODY RECORD
LABORATORY ANALYSIS REQUEST

Information
Company: De Minimis Inc.
Contact: Dale L. Haas
Phone #: 295-4074

Project Name:
Project Number:
P.O. Number: 100817

Sampler's Name: Dale L. Haas
Signature:
Sampling Date: 1-6-93

Provide Verbal Results: ☒ Yes ☐ No
Provide FAX Results: ☒ Yes ☐ No

Comments:

Received @ 4°C: ☒ Yes ☐ No
Appropriate Containers: ☒ Yes ☐ No

SAMPLE #	SAMPLE DESCRIPTION	DATE	TIME	OAL #	MATRIX: Soil	Water	Other	ANALYSES: TPH-HCID OAR/DEQ	TPH-G OAR/DEQ	TPH-D OAR/DEQ	TPH 418.1 MOD OAR/DEQ	TPH 418.1	BTEX 602/8020	Volatiles 624/8240	Semivolatiles 625/8270	Halogenated Volatiles 601/8010	Chlorinated Pesticides 608/3080	PCB 608/8080	TCLP (8) Metals	RUSH	REMARKS
S-1	~~Soil~~ Test pit #1	1-6-93	0940	25-C351 08669	X						2	X						X			
S-2	Test pit #2		1100	08670	X							X						X			
S-3	Test pit #2		1110	08671	X							X						X			
S-4	Test pit #2		1130	08672	X							X						X			
S-5	Test pit #1		1318	08673	X							X						X			
S-6	Test pit #3		1427	08674	X							X						X			
S-7	Test pit #4		1519	08675	X							X						X			
S-8	Test pit #5	↓	1615	08676	X							X						X			
											2										

Changed to 418.1 M 1/8/93 per Rick Johnson

Relinquished
Signature: Dale L. Haas
Date: 1-7-93
Print Name: Dale L. Haas
Time: 12:35 PM
Company: DeMinimis Inc

Received
Signature: Grady Brown
Date: 01-07-93
Print Name: Grady Brown
Time: 1235PM

Relinquished
Signature:
Date:
Print Name:
Time:
Company:

Received
Signature: Daniel Wood
Date: 01-07-93
Print Name:
Time: 402
Company:

Relinquished
Signature:
Date:
Print Name:
Time:
Company:

Received
Signature:
Date:
Print Name:
Time:
Company:

OAL

DEMINIMIS INC.
34 N.W. 1ST
SUITE 101
PORTLAND, OR 97209
RICK JOHNSON
295-4074 FAX 295-0112
100817

REVIEWED BY: SRA
REVIEW DATE: 1/14/93

PCB ANALYSIS OF SOLIDS
BY EPA METHODS 3540 AND 8080

SAMPLE ID:	S-1 TEST PIT #1	S-2 TEST PIT #2	S-3 TEST PIT #2	S-4 TEST PIT #2	S-5 TEST PIT #1
OAL ID: 25-I351-	08669	08670	08671	08672	08673
SAMPLE DATE:	1/6/93	1/6/93	1/6/93	1/6/93	1/6/93
MATRIX:	SOILS	SOIL	SOIL	SOIL	SOIL
EXTRACTION DATE:	1/11/93	1/11/93	1/11/93	1/11/93	1/11/93
ANALYSIS DATE:	1/12/93	1/12/93	1/12/93	1/12/93	1/12/93
PCB MG/KG	ND	0.59	ND	0.17	ND
SURR.RECOVERY %	103.	95.	94.	97.	95.
ANALYST:	CN	CN	CN	CN	CN

MG/KG = PPM
ND = NONE DETECTED(<0.05 MG/KG)
NA = NOT ANALYZED
MI = MATRIX INTERFERENCE WITH SURROGATE RECOVERY
SURROGATE(S) USED: TETRACHLORO-M-XYLENE AND/OR DECACHLOROBIPHENYL

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007
Phone 503-644-5300 • Fax 503-671-1404

Attachment 9

#1 9

DE MINIMIS INC.
ENVIRONMENTAL MANAGEMENT
34 N.W. 1ST AVE., SUITE 101
PORTLAND, OREGON 97209
(503) 295-4074

April 18, 1996

Mr. Dennis Kirkpatrick
GS Roofing Products, Inc.
6350 N.W. Front Avenue
Portland, Oregon, 97210

Dear Mr. Kirkpatrick,

Per our discussion, the following is a brief summary of the sample results obtained in early 1993.

At the request of GS Roofing Products, on January 6, 1993, De Minimis Inc. personnel obtained eight soil samples from five separate test pits at the subject facility. The soil samples were analyzed for Total Petroleum Hydrocarbons by DEQ Method TPH-418.1 Modified, and for polychlorinated biphenyls (PCB) content via EPA Method 8080. All but two of the sample analyses reported results for TPH-418.1 Modified exceeding the regulatory cleanup level. Three of the sample results (S-2 3.0 ppm, S-4 0.15 ppm, and S-6 0.08 ppm) reported detections of PCB content with one result (S-2) exceeding the regulatory cleanup limit (0.7 ppm). Preliminary results of analyses performed by the laboratory indicated that a possible laboratory error had occurred in the PCB analyses. The laboratory re-analyzed the PCB samples at their own initiative. Analytical results of the re-sampling reported results (S-2 0.59 ppm, S-4 0.17 ppm, and S-6 0.08 ppm) below regulatory cleanup guidelines.

If you have any questions or require further clarification of any information in the report, please feel free to contact me at your convenience. Thank you for allowing us the privilege of serving your environmental needs.

Sincerely,

Rick I. Johnson
President

Attachment 10

10

12823 NE Airport Way
Portland, OR 97230
(503) 408-8880
Fax: (503) 408-8716

FAX TRANSMISSION COVER SHEET

Offices in Albany, Coos Bay, Florence, Portland, Roseburg & Springfield
Pac-Cat CCB# 124137 Pac-Cat Environmental CCB# 126132

295 - 4024

To: Dale Harr - DMI Date: 2-16-98

Fax: 295-0112 Subject: Propos: 1

Pages: 3 Sender: Bob Janak

Notes: Proposal to dispose of drums of PCS.

BOB JANAK
CCB# 124137 12823 N.E. AIRPORT WAY
PORTLAND, OR 97230-1030
503.408-8880
FAX 503.408.8716
1.800.262.9443
ALBANY • COOS BAY • FLORENCE
CCB# 126132 ROSEBURG • SPRINGFIELD

PAC CAT PACIFIC CATASTROPHE

PAC CAT ENVIRONMENTAL

February 16, 1998

Mr. Dale Harr
De Minimis Inc.
Environmental Management
34 NW 1st Avenue, Suite 101
Portland, Oregon 97209

Re. Request for Proposal
Disposal of Drums
NW Portland, Oregon

Dear Mr. Harr:

Pac Cat Environmental (Pac Cat) is pleased to submit the following proposal to De Minimis, Inc. (DMI) for the disposal of five drums of Petroleum Contaminated Soil (PCS) located at the above mentioned location.

Pac Cat understands that DMI requests the following task is performed:

- disposal of five drums of PCS at USA Waste in Hillsboro (Option 1). or
- disposal of five drums of PCS at TPS in Portland (Option 2)

[illegible] following tasks;

[illegible] Waste

- setup disposal at USA Waste;
- mob drop box to site;
- empty drums into drop box;
- flatten empty drums and put into drop box;
- transport drop box to USA Waste in Hillsboro; and
- provide client with disposal receipt.

$850.00

Option 2- TPS

- setup disposal at TPS;
- mob to site with truck;
- load drums;
- transport drums to TPS; and
- provide client with disposal receipt.

$825.00

TELFORD
AMMONS
972 580 5623

Pac Cat has made the following assumptions in developing this proposal;

- De Minimis to obtain disposal approval of soil in drums at USA Waste and/or TPS ;
- Proposal does not include disposal cost;
- Pac Cat has access to site and drums;
- drums meet DOT shipping requirements.

The cost to dispose of the drums at USA Waste is **$850.00.**

The cost to dispose of the drums at TPS is **$825.00.**

If you have any questions please call me at 408-8880.

Sincerely

Bob Janak
Pac Cat Environmental

DeMinimis1

GS Roofing Products Company, Inc.
6350 N.W. Front Avenue
Portland, Oregon 97210
503-222-1307

March 10, 1998

Mr. Bob Janak
Pac-Cat Environmental
12823 NE Airport Way
Portland, Oregon 97230

Dear Mr. Janak:

Per our discussion today, you have agreed to remove and transport for disposal 5 drums of Petroleum Contaminated Soil from GS Roofing Products located at 6350 NW Front Ave. Portland, Oregon. The cost to GS Roofing Products is $850.00, not including landfill fees.

Please utilize PO # RW98104 when referencing this project. Please bill our corporate office at:

GS Roofing Products
ATTN: Telford Ammons
Accounts Payable
5525 MacArthur Blvd., Suite 900
Irving, TX. 75038
972-580-5623

Please Fax me a copy of the invoice referencing the above noted PO when you bill our Irving office. My Fax is 248-9271. If you require any additional information, please contact me.

Thank you,

Dennis Kirkpatrick

Dennis Kirkpatrick
Quality, Safety, Environmental

USA WASTE SERVICES, INC....NON HAZARDOUS WASTE DISPOSAL SOLUTIONS FOR THE PACIFIC NORTHWEST

Hillsboro Landfill, Inc.

3205 SE MINTER BRIDGE ROAD HILLSBORO, OR 97123

PERMIT # 4055

PERMIT TO DISPOSE OF NON-HAZARDOUS MATERIALS

EXPIRES: 6/5/98

GENERATOR: G.S. ROOFING PRODUCTS COMPANY, INC.

DESCRIPTION: *PCS - UNLEADED GASOLINE*	**TONS:** *1*
☐ SPECIAL WASTE ☒ PCS	
LOCATION: *PORTLAND, OREGON*	**COUNTY:** *Multnomah*
CONTACT: *DALE HAAR*	**PHONE:** *295-4074*

BILLING: *Landfill account WASTE MANAGEMENT*	**PO#:** *N/A*	**JOB#:** *N/A*

We accept business checks, cash, VISA / Mastercard or charge(with prior approval)

SPECIAL HANDLING : ***NOTE: drums must be emptied and crushed proir to disposal at the landfill.***

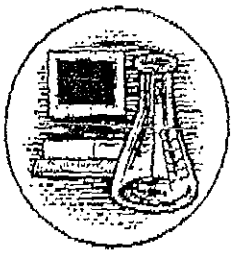
APPROVED: *KRISTIN CLAYTON* DATE: *03/06/98 8:06:11 AM*

A COPY OF THIS PERMIT MUST BE SHOWN BY EACH DRIVER

THERE IS A MINIMUM CHARGE OF $50-$60 FOR EACH LOAD OF SPECIAL WASTE

USA WASTE SERVICES, INC.

HAZARDOUS WASTE IS STRICTLY PROHIBITED



Specialty Analytical

19761 S.W. 95th Place
Tualatin, OR 97062
(503) 612-9007
Fax (503) 612-8572

March 02, 1998

Mr. Dale Haar
De Minimis, Inc.
34 NW First Avenue
Suite 101
Portland, OR 97209

Specialty Analytical Job No: 980129
Project Name: GSR

The following sample was received on February 20, 1998. This report has been completed and the results are presented on the following pages. Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety, without written approval from the laboratory. Should you have any questions regarding this report, please feel free to contact us at (503) 612-9007.

Lab I.D.	Sample I.D.	Matrix	Date Sampled
980129-1	MW-7	Soil	02/20/1998

Report Approved By:

Cindy Day
Project Manager
Specialty Analytical

Technical Review
Specialty Analytical

Client: De Minimis, Inc.
Specialty Analytical Job No: 980129
Project Name: GSR

Sample I.D.	Lab I.D.	Date Sampled
MW-7	980129-1	02/20/1998

Parameter	Method	Sample Results	Reporting Limit	Units	Date Analyzed	Flags
TCLP Metals						
TCLP Extraction	1311	-			02/21/1998	
ICP Digestion		-			02/25/1998	
TCLP-Lead, ICP	6010	ND	0.15	mg/L	02/25/1998	

March 02, 1998

Client: De Minimis, Inc.
Specialty Analytical Job No: 980129
Project Name: GSR

METHOD BLANK

Sample I.D.
Method Blank

Parameter	Method	Sample Results	Reporting Limit	Units	Date Analyzed	Flags
TCLP Metals						
TCLP-Lead, ICP	6010	ND	0.15	mg/L	02/25/1998	

March 02, 1998

Client: De Minimis, Inc.
Specialty Analytical Job No: 980129
Project Name: GSR

MATRIX SPIKE REPORT

Parameter	Matrix Spike Amount	Sample Result	Matrix Spike Concentration	Percent Recovery	Units	Date Analyzed	Flags
TCLP Metals							
TCLP-Lead, ICP	5.00	ND	5.11	102.0	mg/L	02/25/1998	

KEY TO FLAGS

A. This sample not identified as a specific hydrocarbon. Quantitated against gasoline.

A1. This sample not identified as a specific hydrocarbon. Quantitated against diesel.

A2. This sample not identified as a specific hydrocarbon. Quantitated against lube oil.

A3. Results determined to be non detect based on hydrocarbon pattern recognition.

B. The blank exhibited a positive result greater than the reporting limit for this compound.

CN. See case narrative.

Dil. Result was calculated from dilution.

G. The positive result for gasoline is due to single component contamination.

HT. Sample was received outside recommended holding times, but analyzed at clients request.

HX. Peaks detected within the quantitation range do not match standard used.

J. The result for this compound is an estimated concentration.

L. The LCS recovery exceeded control limits.

M. MS and/or MSD percent recovery exceeds control limits.

MC. Sample concentration is greater than 5x the spiked value; the spiked value is considered insignificant.

MI. Outside control limits due to Matrix Interference.

MP. RPD between sample duplicates or MS/MSD exceeds 20%

MR. The MS/MSD RPD is greater than 20% The sample was re-extracted and re-analyzed with similar results. This is due to matrix interference, likely a non-homogeneity of the sample.

MSA. Value determined by Method of Standard Additions.

P. A post digestion spike was analyzed, and recoveries are within control limits.

Q. Detection limits elevated due to sample matrix.

R. The duplicate RPD was greater than 20%. The sample was re-extracted and re-analyzed with similar results. This indicates a matrix interference in the sample, likely a non-homogeneity of the sample.

RP. Matrix spike values exceed established QC limits, post digestion spike is in control.

SR. Surrogate recovery outside control limits.

W. The duplicate RPD was greater than 20%. Due to insufficient sample, re-analysis was not possible.

X. Sample was analyzed outside of recommended holding times.

Y. The result for this parameter was greater than the TCLP regulatory limit.

Z. The pattern seen for the parameter being analyzed is not typical.

rev. October 14, 1997

CHAIN OF CUSTODY RECORD

Specialty Analytical
19761 S.W. 95th Place
Tualatin, OR 97062
(503) 612-9007 - Phone
(503) 612-8572 - Fax

Contact Person/Project Manager: Dale L. Haar

Company: De Minimis Inc.

Address: 34 NW First Ave., Ste. 101 Portland OR 9

Phone: 295-4074 Fax: 295-0112

Project No.: ~~GSK~~ (DLH) Project Name: GSK

Invoice To: DMI P.O. No.:

Collected By:

Signature: [signature]

Printed: Dale L. Haar

Signature:

Printed:

Turn Around Time

☒ Normal

☐ Rush ______ Specify

Rush Analyses Must Be Scheduled With The Lab In Advance

For Laboratory Use

Lab Job No. 980129

Shipped Via

Air Bill No.

Temperature On Receipt ____ °C

Specialty Analytical Containers? Y / N

Specialty Analytical Trip Blanks? Y / N

Date	Time	Sample I.D.	Matrix	No. of Containers	Analyses: TCLP-Lead										Comments	Lab I.D.
2-20-98	1317	MW-7	Soil	2	X											

Relinquished By: [signature]	Date	Time	Received By:	Relinquished By:	Date	Time
Company: DMI	2-20-98	1710	Company:	Company:		
				Received For Lab By: [signature]	2/21	

Unless Reclaimed, Samples Will Be Disposed of 60 Days After Receipt.

Copies: White-Original Yellow-Project File Pink-Customer Copy

USA WASTE SERVICES, INC... NON HAZARDOUS WASTE DISPOSAL SOLUTIONS FOR THE PACIFIC NORTHWEST

Hillsboro Landfill, Inc.

3205 SE MINTER BRIDGE ROAD HILLSBORO, OR 97123

PERMIT # 1696

PERMIT TO DISPOSE OF NON-HAZARDOUS MATERIALS

EXPIRES: 1/16/99

GENERATOR: GS ROOFING PRODUCTS CO.,INC.

DESCRIPTION: *SOLIDIFIED ASPHALT RESIDUE AND HARDENED ASPHALT*	**TONS:** *18*
☒ **SPECIAL WASTE** ☐ **PCS**	
LOCATION: *PORTALND OREGON*	**COUNTY:** *Multnomah*
CONTACT: *DENNIS KIRKPATRICK*	**PHONE:** *503-222-1307*

BILLING: *Landfill account WASTE MANAGEMENT*	**PO#:** *96005025*	**JOB#:** *N/A*

We accept business checks, cash, VISA / Mastercard or charge(with prior approval)

SPECIAL HANDLING : *NONE:*

APPROVED: KC *KRISTIN CLAYTON* DATE: *03/06/98 8:06:59 AM*

A COPY OF THIS PERMIT MUST BE SHOWN BY EACH DRIVER

THERE IS A MINIMUM CHARGE OF $50-$60 FOR EACH LOAD OF SPECIAL WASTE

USA WASTE SERVICES, INC.

HAZARDOUS WASTE IS STRICTLY PROHIBITED

Attachment 11

VOLUNTARY CLEANUP PROGRAM
INDEPENDENT CLEANUP PATHWAY
INTENT TO PARTICIPATE

Identification of Site

Site Name: GS Roofing Products Company, Inc.

Site Address: 6350 W. Front Avenue

Owner/Operator: CertainTeed Corporation

Mailing Address: 6350 W. Front Avenue, Portland OR 97210

Township: 1N Range: 1W Section: 13 Tax Lot (s): R315776and R324203

Latitude (Lat) Degrees: 45 Minutes: 34 Seconds: 13

Longitude (Long) Degrees: 122 Minutes: 44 Seconds: 37

Method of determining Lat/Long: Topographic quadrangle

(Note: If you cannot provide a lat/long for your site, please include a 7.5 topographical map, with the site clearly marked on it, along with this form and we will determine the lat/long for you.)

Estimation of Oversight Needed

Based on your information about the site, what is your initial estimation of the level of oversight needed from the Department of Environmental Quality (DEQ):

____ Unknown at this time because:

_____

____ Preliminary assessment (PA) - A PA is the initial investigation of a site to determine whether a release of a hazardous substance requires further investigation or cleanup to protect public health, safety, welfare, and the environment. A PA has been conducted and needs DEQ review, or a PA needs to be conducted.

____ Level 1 (simple cleanup) Level 1 sites are those where: (a) hazardous

substances are limited to containers or to the unsaturated soil zone only; (b) the extent and type(s) of contamination is well-defined; (c) there are few contaminants of concern; and (d) the selected treatment option is a conventional technology.

____ Level 2 (moderately complex) or Level 3 (complex) cleanup - This category includes all sites that do not meet Level 1 criteria.

_X_ Independent Cleanup Pathway – Investigation/cleanup that will be conducted without DEQ oversight.

- Estimated date when final report will be submitted to DEQ for review: XPA 6/1/2004 (month/day/year)

- Will you require any DEQ Technical Consultation during execution of the project? ____Yes _X_No

Independent Cleanups – Site Eligibility

If you intend to participate in DEQ' s Independent Cleanup Pathway (ICP) and your site has not been ranked by DEQ' s Site Assessment Program, you should complete the Initial Site Screening form as a first step in determining if your site is eligible. Even if your site does not meet the site screening criteria on that form, the ICP may still be an option. In order to make that determination, you will need to provide DEQ with enough information for us to complete the Site Assessment Prioritization System (SAPS) score sheet. Please discuss this with DEQ' s Voluntary Cleanup Program Representative in this regional office.

Summary of Potential Contamination

Briefly describe the source, volume and type of contaminant(s) present on the property (or attach statement): Refer to the attached June 14, 2002 and June 26, 2002 correspondences, as well as Attachments one through ten of this correspondence

Are hazardous substance contaminants present in the groundwater?

____ Yes ____No ____Unknown

If yes, describe the contaminants and concentrations:

Benzene	<0.5 to 13.1 µg/L	(11/28/2000)
Toluene	<1.0 to 508 µg/L	(11/28/2000)
Ethylbenzene	<1.0 to 597 µg/L	(11/28/2000)
Total Xylenes	<1.0 to 2,580 µg/L	(11/28/2000)
Gasoline-Range Hydrocarbons	ND to 12,500 µg/L	(11/28/2000)

Note: An upgradient source (Wilbridge Group) of aromatic hydrocarbons is present.

Intent to Participate

The undersigned intends to participate in DEQ' s Voluntary Cleanup Program, either with a negotiated level of DEQ oversight or through the Independent Cleanup Pathway.

If DEQ technical consultation or oversight of investigation and/or cleanup activities is requested, the undersigned intends to negotiate in good faith a written agreement with DEQ to provide for voluntary oversight. However, this Intent to Participate does not constitute such an agreement, and neither DEQ nor the undersigned will be bound to proceed with voluntary oversight unless such an agreement is executed. The agreement will describe the project activities of each party and will require the undersigned to reimburse DEQ for all of its oversight costs.

If the site is placed on DEQ' s waiting list, DEQ will notify the undersigned in writing when it is moved to active status and include a cost recovery agreement for signature. Following receipt of a signed agreement (or earlier), the undersigned shall be prepared to submit all documentation summarizing existing conditions, activities and status at the site to DEQ for review. The undersigned understands that DEQ will move sites from the waiting list to active status based on various considerations, only one of which will be the timing of the original placement of a site on the waiting list.

With this Intent to Participate, the undersigned does not admit or assume liability for investigation or cleanup of the site. In addition, the undersigned may terminate the Intent to Participate at any time.

Please execute this Intent to Participate in the space below and return to :

Department of Environmental Quality
Voluntary Cleanup Program
(address)

Please DO NOT submit a deposit check at this time.

By: _____
(signature of authorized officer)

Name: Anthony Aldridge
(print or type)

Title: QA Manager

Company: CERTAINTEED

Date: 7/8/03

Telephone: 503 243-5244

SAINT-GOBAIN
CORPORATION

June 14, 2002

Mr. Mark Pugh, R.G.
Oregon Department of Environmental Quality
Northwest Region Portland Office
2020 Southwest 4th Avenue, Suite 400
Portland, Oregon 97201-4987

RE: Notice of Site Assessment Review

Dear Mark:

Enclosed is GS Roofing Product Company, Inc.'s submittal Notice of Site Assessment Review which your Department sent to GS facility. Please note that some of the information contained in this submittal is confidential. Accordingly, I have stamped the entire document confidential. If you would like me to redact that information which is confidential, please let me know.

Very truly yours,

Lauren P. Alterman
Senior Counsel

LPA:bbs
Enclosure

cc: Tony Aldridge - Portland
Martha Bixby
Dave LaBelle
Ron Sanders - Tampa

36729

Saint-Gobain Corporation
750 E Swedesford Road • PO Box 860 • Valley Forge, PA 19482 • Tel (610) 341-7000 • Fax: (610) 341-7087

SAINT-GOBAIN
CORPORATION

June 26, 2002

Via Fax - 503-229-6945

Mr. Mark Pugh, R.G.
Oregon Department of Environmental Quality
Northwest Region Portland Office
2020 Southwest 4th Avenue, Suite 400
Portland, Oregon 97201-4987

RE: Notice of Site Assessment Review

Dear Mark:

Enclosed is the attachment that was inadvertently left out of GS' Site Assessment Review for its facility in Portland, Oregon. The attachment is in response to question three.

If you have any questions regarding the attachment or anything else regarding GS' Site Assessment Review, please feel free to call me.

Very truly yours,

Lauren P. Alterman
Senior Counsel

LPA:bbs
Enclosure

cc: Tony Aldridge - Portland

36729

Saint-Gobain Corporation
750 E. Swedesford Road • PO Box 860 • Valley Forge, PA 19482 • Tel: (610) 341-7000 • Fax: (610) 341-7087

Chemical Amounts Used at Site

Chemical	Maximum Volume Stored on Site	Volume Used per Year
Thermo Oil	275 gallons	550 gallons
Diesel	3000 gallons	1500 gallons
Gasoline	20 gallons	20 gallons
Paints	20 gallons	20 galons
Citrus Solvent	55 gallons	500 gallons
Lube Oil	330 gallons	400 gallons
Grease	60 gallons	1000 pounds
Printing Ink	4 gallons	125 gallons

Current Storage Areas

Tank Contents	Capacity (gallons)	Age	Construction Material	
ASPHALT	30,000	25+	STEEL	inspected monthly
ASPHALT	35,000	25+	STEEL	inspected monthly
ASPHALT	20,000	25+	STEEL	inspected monthly
ASPHALT	20,000	25+	STEEL	inspected monthly
LAMINATE	18,000	10+	STEEL	inspected monthly
WINDSEAL	8,000	10+	STEEL	inspected monthly
MODIFIED RUBBER	3,000	25+	STEEL	inspected monthly
USED OIL/SLUDGE	280	25+	STEEL	inspected monthly
HEATING OIL (empty)	20,000	25+	STEEL	inspected monthly
DIESEL HEATING OIL	3,000	10+	STEEL	inspected monthly
LIMESTONE	100 ton	20+	STEEL	inspected monthly
COATING SURGE MIXER	1,200	20+	STEEL	inspected monthly

Permit Information

Permit	Issue Date	Expiration Date	Regulating Agency
Industrial Wastewater Discharge Permit #400.093	9/20/1999	9/15/2004	City of Portland
Non-Contact Cooling Water NPDES Permit #0100-J File #8550	10/22/1996	7/2001 Wait for DEQ to issue new permit.	Department of Environmental Quality
Stormwater Discharge NPDES Permit #1200-Z File #8550	7/22/1997	6/30/2002	Department of Environmental Quality
Radioactive Material Permit	July 2001	July 2002	Oregon Health Division
Air Quality Permit #26-2043	4/21/1992	12/1/2010	Department of Environmental Quality

Permit Information

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Air Quality Permit #26-2043	4/21/1992	12/1/2010	Department of Environmental Quality

1. BACKGROUND INFORMATION

Facility Name:	CertainTeed Roofing/Daniel Pofelski (Plant Manager)
Facility Address:	6350 NW Front Avenue Portland, Oregon 97210
Facility Owner/Operator:	G.S. Roofing Products Company, Inc.
Phone Number:	(503) 222-1307
Address:	6850 NW Front Avenue Portland, OR 97210
Property Owner:	G.S. Roofing Products Company, Inc.
Current Use Of Site:	Manufacturing of roofing products including asphalt-based shingles and roll goods.
Past Use of Site:	First built in 1939, the facility has been operated by a series of roofing manufacturing companies. CertainTeed acquired the facility from GS in 1999.
Size of Site:	Approximately 17.5 acres
Site Security:	Employees are on site 24 hours a day except on major holidays. In addition, on weekends Burns Security is on site. The entire property is fenced with the exception of the eastern boundary (river side).
Adjacent Property Uses:	North: AutoChem (industrial) South: Oil Refinery (industrial) East: Willamette River West: Oil Refinery (industrial)

2. SITE MAP

Attached.

3. CHEMICAL/WASTE HANDLING INFORMATION

Chemicals Used at Site:	Texaco R & O 46, Diesel, Gasoline, Paints, Citrus Solvent, Lube Oil, Grease, Printing Ink
Raw Materials:	Colored granules, Headlap granules, Coating, Flux, Limestone Filler, Krayon 1184, Mylar Tape, Laminate, Windseal, Aristowax, Copper Granules, Sand
Chemical Amounts Used at Site:	See the attached spreadsheet.
Waste Products Generated or Stored at Site:	See the attached spreadsheet.
On-Site Waste Treatment Systems:	Waste water-settling pond. Smoke and exhaust gases are treated by a CECO Filter System.
Past Disposal Areas:	Coating, sand, granules, and tale were stored on the ground on the east corner of the property until approximately 1993 when the area, including some of these materials, was paved over. The area is still used for storage.

Current Storage Areas: See the attached spreadsheet.

Type, Quantity, and Destination of all Wastes removed from site: See the attached spreadsheet

Spills that have occurred at the site:

4/5/1990 Soil was removed during the decommissioning and removal of a 1000-gallon gasoline UST located near the southwest corner of the site. More information regarding the monitoring and removal of the soil is found in Section 5. DEQ issued a No Further Action letter regarding this area on March 15, 2001.

8/1991 An environmental assessment discovered low to moderate levels of diesel and gasoline contamination from a diesel UST located northwest of the boiler room. The UST was decommissioned and removed. More information regarding the monitoring and removal of the soil is found in Section 5. DEQ issued a No Further Action letter regarding this area on March 15, 2001.

4. PERMIT INFORMATION

See the attached spreadsheet.

5. SAMPLING AND CLEAN UP INFORMATION

All environmental sampling/monitoring performed at site:

One of the permits requires non-contact cooling water monthly discharge reports to be submitted to DEQ. The plant utilizes a cooling tower, and the permit is kept for cooling tower blow down purposes only.
Monthly checking of the stormwater outfalls.
Prior to the receipt of the Letter of Further Action from DEQ, the facility regularly sampled the monitoring wells on site.

Soil excavations or removals, spill cleanups, groundwater treatment, performed at site:

In August 1992, 80 cubic yards of soil was removed from around a former gasoline UST that had been removed in 1991.
From October 1991 to February 1995, ten monitoring wells were installed at the site. Quarterly monitoring of the wells began in 1991 and continued through the first quarter 1998. On March 15, 2001, DEQ issued a letter stating that no further action is required at the site.

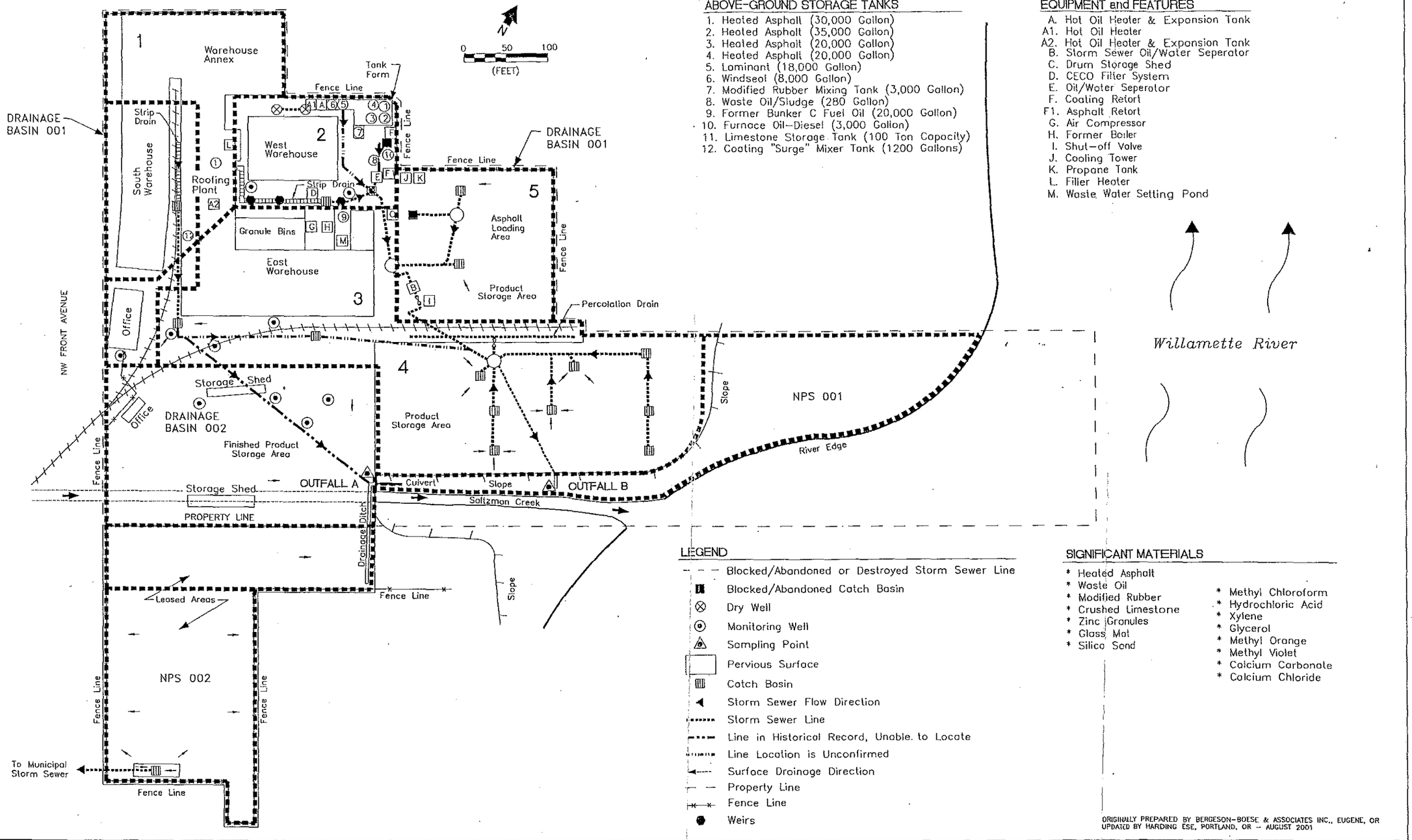

Figure 4: Site Features